



March 23, 2017
NRC:17:014

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

PROJ0728

Response to Request for Additional Information Regarding BAW-10179P Revision 9, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses"

AREVA Inc. (AREVA) requested the NRC's review and approval of topical report BAW-10179P Revision 9, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses" in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2. The response to this RAI is enclosed with this letter.

AREVA requested the NRC's concurrence (Reference 3) that topical report BAW-2149A is applicable to cores containing fresh fuel assemblies containing stainless steel rods as well as reconstituted fuel assemblies. The NRC provided a letter (Reference 4) indicating concurrence that the topical report BAW-2149A is applicable to fresh fuel assemblies. In Reference 4 the NRC requested that AREVA provide a revision to BAW-10179PA Revision 8 reflecting the NRC concurrence. The changes to BAW-10179P reflect the NRC concurrence and are included as additional information in the enclosed RAI response.

AREVA considers some of the information contained in the enclosed documents to be proprietary. As required by 10 CFR 2.390(b) an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the RAI responses are enclosed.

There are no commitments within this letter or its enclosures.

If you have any questions related to this information, please contact Ms. Gayle F. Elliott, Product Licensing Manager, by telephone at (434) 832-3347, or by e-mail at Gayle.Elliott@areva.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

YG01
NRR

AREVA INC.

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References

- Ref. 1: Letter, Gary Peters (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of BAW-10179P, Revision 9 'Safety Criteria and Methodology for Acceptable Cycle Reload Analyses'," NRC:16:008, April 15, 2016.
- Ref. 2: Letter, Jonathan G. Rowley (NRC) to Gary Peters (AREVA Inc.) "Request for Additional Information Regarding AREVA Inc. Topical Report BAW-10179P, Revision 9, 'Safety Criteria and Methodology for Acceptable Cycle Reload Analyses', (CAC No. MF8167)," February 23, 2017.
- Ref. 3: Letter, Gary Peters (AREVA Inc.) to Document Control Desk (NRC), "Request for NRC Concurrence Regarding the Applicability of Topical Report BAW-2149A 'Evaluation of Replacement Rods in BWFC Fuel Assemblies' to Cores Containing Fresh Fuel Assemblies With Stainless Steel Rods," NRC:16:018, July 7, 2016.
- Ref. 4: Letter, Kevin Hsueh (NRC) to Gary Peters (AREVA Inc.), "Request for U.S. Nuclear Regulatory Commission Concurrence Regarding the Applicability of Topical Report BWR-2149A, 'Evaluation of Replacement Rods in BWFC Fuel Assemblies' to Cores Containing Fresh Fuel Assemblies with Stainless Steel Rods," February 1, 2017.

Enclosures

1. BAW-10179 Revision 9, Q1P Revision 0, "Response to Request for Additional Information – BAW-10179P Revision 9"
2. BAW-10179 Revision 9, Q1NP Revision 0, "Response to Request for Additional Information – BAW-10179P Revision 9"
3. Notarized Affidavit

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(a), 6(c) and 6(d) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Tam Ryan

SUBSCRIBED before me this 21st
day of March, 2017.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

