



March 31, 2017  
NRC:17:015

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

**Response to Request for Additional Information Regarding ANP-10338P Revision 0 "AREA™ – ARCADIA® Rod Ejection Accident"**

Ref. 1: Letter, Pedro Salas (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10338P, 'AREA™ - ARCADIA® Rod Ejection Accident'," NRC:15:038, October 9, 2015.

Ref. 2: Letter, Jonathan G. Rowley (NRC) to Gary Peters (AREVA Inc.), "Request for Additional Information Re: AREVA Inc. Topical Report ANP-10338P, 'AREA – ARCADIA Rod Ejection Accident' (CAC No. MF7009)," January 23, 2017.

AREVA Inc. (AREVA) requested the NRC's review and approval of the topical report ANP-10338P, "AREA™ - ARCADIA® Rod Ejection Accident" 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 considers some of the material contained in the enclosed 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 response are provided.

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](mailto:Gayle.Elliott@areva.com).

Sincerely,

A handwritten signature in cursive script that reads "Gary Peters".

Gary Peters, Director  
Licensing & Regulatory Affairs  
AREVA Inc.

cc: J. G. Rowley  
Project 728

**AREVA INC.**

3315 Old Forest Road, Lynchburg, VA 24501  
Tel.: 434 832 3000 - [www.areva.com](http://www.areva.com)

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Enclosures:

1. Proprietary copy of ANP-10338 Q1P, Revision 0, "Response to Request for Additional Information – ANP-10338P"
2. Non- Proprietary copy of ANP-10338 Q1NP, Revision 0, "Response to Request for Additional Information – ANP-10338P"
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(c), 6(d), and 6(e) 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.

Mavis E. Byrnes

SUBSCRIBED before me this 29<sup>th</sup>  
day of March, 2017.

Smuck

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

