



April 27, 2017
NRC:17:022

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

PRDS0728

Response to Request for Comment on AREVA Inc. Topical Report BAW-10247PA, Revision 0, Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods"

- Ref. 1: Letter, Gary Peters (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval for BAW-10247P-A, Revision 0, Supplement 2P, Revision 0, 'Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods'," NRC:16:012, April 29, 2016.
- Ref. 2: Letter, Jonathan G. Rowley (NRC) to Gary Peters (AREVA Inc.), "Request for Additional Information Re: AREVA Inc. Topical Report BAW-10247P-A, Supplement 2, Revision 0, 'Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods'," (CAC NO. MF7708), February 23, 2017.

In Reference 1, AREVA Inc. (AREVA) requested the NRC's review and approval of the topical report BAW-10247P-A, Revision 0, Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods." The NRC provided a request for additional information (RAI) in Reference 2. AREVA's response to the RAI is enclosed to this letter. Also enclosed to this letter is a DVD including data referenced in the enclosed response to the NRC's RAI 2-f.

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

There are no new commitments within this letter or its enclosures.

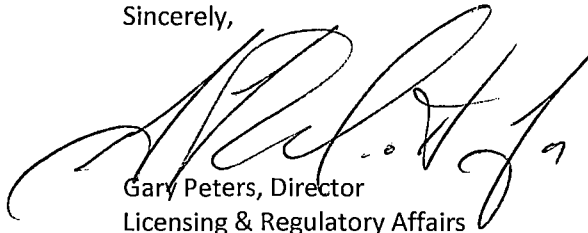
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NRR

AREVA INC.

3315 Old Forest Road, Lynchburg, VA 24501
Tel.: 434 832 3000 - www.aveva.com

If you have any questions related to this letter please contact Mr. Morris E. Byram, Product Licensing Manager, by telephone at 434-832-4665 or by e-mail at Morris.Byram@areva.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

Enclosures:

1. A Proprietary Copy of the Report, BAW-10247PA, Revision 0, Supplement 2Q1P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 1: Mechanical Methods – Responses to NRC Request for Additional Information"
2. A Non-Proprietary Copy of the Report, BAW-10247PA, Revision 0, Supplement 2Q1P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 1: Mechanical Methods – Responses to NRC Request for Additional Information"
3. DVD: "Rod Bow, Fuel Assembly Growth, and Fuel Rod Growth Data Referenced in RAI 2f Response of BAW-10247PA, Rev. 0, Supp. 2 Q1P Rev. 0"
4. Notarized Affidavit

AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is Morris Byram. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in the report BAW-10247PA, Revision 0, Supplement 2Q1P, Revision 0, entitled "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 1: Mechanical Methods Responses to NRC Request for Additional Information," and the DVD files named "Fuel Assembly Growth.pdf", "Fuel Rod Growth.pdf", and "Rod Bow.pdf" referred to herein as "Documents." Information contained in these documents has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. for the control and protection of proprietary and confidential information.

4. These documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these documents as proprietary and confidential.

5. These documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these documents

be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is 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 these documents 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 these documents 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.

Mendis E Byrnes

SUBSCRIBED before me this 26th
day of April, 2017.

Hailey M. Siekawitch

