



May 4, 2017
NRC:17:021

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

Request for Review and Approval of BAW-10227, Revision 1, Supplement 1P, "Evaluation of Advanced Cladding and Structural Material (M5) in PWR Reactor Fuel"

Ref.1: Letter, James F. Mallay (Framatome ANP), to Document Control Desk (NRC), "Publication of BAW-10227P-A, Revision 1, "Evaluation of Advanced Cladding and Structural Material (M5) in PWR Reactor Fuel'," NRC:04:021, April 19, 2004.

AREVA Inc. (AREVA) published topical report (TR) BAW-10227P-A, Revision 1, "Evaluation of Advanced Cladding and Structural Material (M5) in PWR Reactor Fuel, June 2003" in Reference 1 after receiving NRC approval.

AREVA requests the NRC's review and approval of TR BAW-10227, Revision 1, Supplement 1P, "Evaluation of Advanced Cladding and Structural Material (M5) in PWR Reactor Fuel". This supplement extends the range of applicability of the models and methods previously approved for M5, and demonstrates that the properties and performance of M5 are unchanged with the modified composition; therefore, existing approved topical reports and analyses remain valid.

AREVA would appreciate the NRC approval of this topical report by April 2020.

AREVA considers some of the material contained in the enclosed document 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. A proprietary version and a non-proprietary version of the report are enclosed.

There are no commitments within this letter or its enclosures.

If you have any questions related to this information, please contact Mr. Tom Ryan by telephone at (434) 832-3152, or by e-mail at Tom.Ryan@areva.com.

Sincerely,

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

Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

T007
YGD1
NRR

AREVA INC.

cc: J. G. Rowley
Project 728

Enclosures:

1. A proprietary copy of topical report BAW-10227, Revision 1, Supplement 1P
2. A non-Proprietary copy of topical report BAW-10227, Revision 1, Supplement 1NP
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.

Tan Ryan

SUBSCRIBED before me this 3rd

day of May, 2017.

Sherry L. McFaden

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

