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

PRDJD728

Response to Request for Additional Information Regarding Topical Report ANP-10297PA Supplement 1, "The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results"

- Ref. 1: Letter, Pedro Salas (AREVA) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10297P-A Revision 0, Supplement 1, 'The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results Topical Report'," NRC:15:031, June 26, 2015.
- Ref. 2: Letter, Jonathan Rowley (NRC) to Gary Peters (AREVA), "Request for Additional Information RE: AREVA Inc. Topical Report ANP-10297P(A), Revision 0, Supplement 1, 'The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results' (CAC NO. MF6469)," April 18, 2017.

AREVA Inc. (AREVA) requested the NRC's review and approval of ANP-10297PA Supplement 1, "The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results" in Reference 1. The NRC requested additional information regarding this topical report in Reference 2. AREVA's response to this request is enclosed with this letter.

AREVA considers some of the material contained in the enclosure to be proprietary. As required by 10 CFR 2.390(b), an affidavit is attached to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of AREVA's response are provided.

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

If you have any questions related to this information, please contact Mr. Nathan Hottle by telephone at (434) 832-3864, or by e-mail at Nathan.Hottle@areva.com.

Sincerely,

Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

YGDI
NRR

AREVA INC.

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

cc: J. G. Rowley
Project 728

Enclosures:

1. Proprietary copy of ANP-10297, Rev. 0, Supplement 1, Rev. 0, Q1P, Revision 0, "Response to Request for Additional Information – ANP-10297PA Supplement 1"
2. Non-Proprietary copy of ANP-10297, Rev. 0, Supplement 1, Rev. 0, Q1NP, Revision 0, "Response to Request for Additional Information – ANP-10297PA Supplement 1"
3. Notarized Affidavit for Withholding of Proprietary Information

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Nathan E. Hottle. 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 following document: "Response to Request for Additional Information – ANP-10297PA Supplement 1," referred to herein as "Document." Information contained in this Document 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. This Document contains 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 this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document 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 this Document is considered proprietary for the reasons set forth in paragraphs 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.

Matthew E. Helli

SUBSCRIBED before me this 30th
day of May, 2017.

Sherry L. McFaden

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

