



June 2, 2017
NRC:17:024

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

PRJ0728

Request for NRC Concurrence Regarding Acceptability of the Standard Friction Factor Correlation within ANP-10311P-A, "COBRA-FLX: A Core Thermal-Hydraulic Analysis Code"

Ref. 1: ANP-10311P-A, "COBRA-FLX: A Core Thermal-Hydraulic Analysis Code," AREVA NP Inc., January 2013.

AREVA Inc. (AREVA) requests formal NRC concurrence that the standard friction factor correlation described within ANP-10311P-A, "COBRA-FLX: A Core Thermal-Hydraulic Analysis Code" (Reference 1), is approved for licensing calculations using COBRA-FLX. Following receipt of a letter from the NRC indicating concurrence, AREVA plans to submit a revision to ANP-10311P-A reflecting the NRC concurrence letter.

In ANP-10311P, AREVA identified the Lehmann friction factor correlation in a list of empirical correlations for requested review and approval. Consistent with AREVA's topical report, the NRC identified approval for use of the Lehmann friction factor correlation in the Final Safety Evaluation (Reference 1). However, as addressed in Enclosure 1, AREVA believes that the NRC review affirmed the acceptability of the standard friction factor correlation as well. Contingent upon NRC's concurrence, AREVA plans to use the standard friction factor correlation in future licensing calculations.

Additionally, Enclosure 1 identifies other changes to the topical report that AREVA proposes to include in the revised approved version. Specifically, a transient benchmarking error was discovered and has been corrected. As justified in Enclosure 1, AREVA believes that the revised benchmark does not impact the conclusions of the topical report. Also, some minor editorial changes are identified. These changes are only included here for convenience so that they may be included in the revised approved version.

AREVA considers some of the information contained in Enclosure 1 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 Topical Report Errata are provided.

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

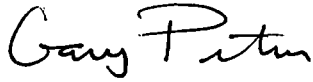
YGOI
NRR

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. Nathan E. Hottle, Product Licensing Manager, by telephone at 434-832-3864 or by e-mail at Nathan.Hottle@areva.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

Enclosures:

1. A proprietary copy of ANP-10311 Revision 0 Errata 1P-000, COBRA-FLX: A Core Thermal-Hydraulic Analysis Code
2. A non-proprietary copy of ANP-10311 Revision 0 Errata 1NP-000, COBRA-FLX: A Core Thermal-Hydraulic Analysis Code
3. Notarized affidavit to support withholding of proprietary information

A F F I D A V I T

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: ANP-10311 Revision 0 Errata 1P-000 "COBRA-FLX: A Core Thermal-Hydraulic Analysis Code," 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.

Mark E. Halls

SUBSCRIBED before me this 18th

day of June, 2017.

Sherry L. McFaden

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

