



July 31, 2017
NRC:17:033

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

PROJ0728

Additional Information Regarding ANP-10334P, "Q12™ Structural Material"

Ref. 1: Letter, Pedro Salas (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10334P, 'Q12™ Structural Material'," NRC-15-042, October 29, 2015.

AREVA Inc. (AREVA) requested NRC review and approval of ANP-10334P, "Q12™ Structural Material" in Reference 1. In May 2017, AREVA notified the NRC by telephone of an error affecting the topical report and requested that the NRC delay the approval process until AREVA could address the error and provide updated topical report content. Enclosure 1 to this letter contains the updated topical report content that AREVA intends to publish in the approved version of the topical report. AREVA requests that the NRC resume the review and approval of ANP-10334P with consideration of these changes.

AREVA considers some of the material contained in Enclosure 1 to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed (Enclosure 3) to support the withholding of the information from public disclosure. Proprietary and non-proprietary reports are provided (Enclosures 1 and 2).

There are no new commitments contained 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,

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

Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

YGDI
NRR

AREVA INC.

3315 Old Forest Road, Lynchburg, VA 24501
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Enclosures

1. ANP-10334Q3P Revision 0, "Additional Information – ANP-10334P, Q12™ Structural Material Topical Report" (PROPRIETARY)
2. ANP-10334Q3NP Revision 0, "Additional Information – ANP-10334P, Q12™ Structural Material Topical Report" (PUBLIC)
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.

Matthew E. Hutto

SUBSCRIBED before me this 25th
day of July, 2017.

Sherry L. McFaden

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

