



September 8, 2017  
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U.S. Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

FRDSD728

**Response to Request for Comment on Draft Safety Evaluation for BAW-10192PA-00, Supplement 1, Revision 0, "BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants"**

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (AREVA), "Draft Safety Evaluation for AREVA Inc. Topical Report BAW-10192PA-00, Supplement 1, Revision 0, 'BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants'," (CAC No. MF7145), August 18, 2017.

In Reference 1, the NRC requested AREVA's review and comment on the draft safety evaluation for topical report BAW-10192PA-00, Supplement 1, Revision 0 "BWNT LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants." AREVA has reviewed the draft safety evaluation and offers the enclosed comments for consideration in preparing the final safety evaluation.

A summary table of AREVA's comments on the draft safety evaluation is attached. A marked-up copy of the draft safety evaluation showing the proposed changes is enclosed. AREVA considers some of the material contained in the enclosure to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support withholding of information from public disclosure.

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

If you have any questions related to this information, please contact Ms. Gayle Elliott, Product Licensing Manager, by telephone at (434) 832-3347, or by e-mail at [Gayle.Elliott@areva.com](mailto:Gayle.Elliott@areva.com).

Sincerely,

Gary Peters, Director  
Licensing & Regulatory Affairs  
AREVA Inc.

cc: J. G. Rowley  
Project 728

YGDI  
NR

**AREVA INC.**

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Enclosures:

- 1) Summary Table – AREVA Comments on BAW-10192PA Supplement 1 Draft Safety Evaluation
- 2) Marked Copy – BAW-10192PA, Supplement 1, Draft Safety Evaluation (PROPRIETARY)
- 3) Notarized Affidavit

**Summary Table – AREVA Comments on BAW-10192PA Supplement 1  
Draft Safety Evaluation**

<b>Page</b>	<b>Line</b>	<b>Proposed Change/Comment</b>
8	16-17	Proprietary information. Add proprietary marks to Table 1 as shown in the enclosed markup, consistent with the topical report Section 3.1.1.
10	12	Proprietary information. Add proprietary marks as shown in the enclosed markup, consistent with the topical report Section 3.1.1.
19	36	Proprietary information. Remove brackets from "Gap Gas Multiplier".
21	31-37	It is suggested that the proprietary marks be bold.
22	2	Proprietary information. Add proprietary marks as shown in the enclosed markup, consistent with the topical report.
23	25	Proprietary information. Modify the proprietary marks as shown in the enclosed markup, consistent with the topical report.
23	26	It is suggested that the right proprietary bracket be bold.
25	21-23	The first two sentences in Section 3.4.2 are unclear. There are references to "former" and "latter" that are undefined since there is no preceding text to anchor these references. Consider adding a paragraph at the beginning of Section 3.4.2 to define the "former" and "latter" references.

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: "AREVA Letter – Response to Request for Comment on Draft Safety Evaluation for BAW-10192PA-00, Supplement1, Revision 0," 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. House

SUBSCRIBED before me this 7<sup>th</sup>  
day of September, 2017.

Sherry L. McFaden

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

