



November 7, 2017
NRC:17:046

PROS0728

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

Response to Request for Comment on Draft SER for ANP-10300P, Revision 0, "AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Transient and Accident Scenarios (CAC NO. ME2979)"

Ref. 1: Letter, Dennis Morey (NRC) to Gary Peters (AREVA Inc.), "Draft Safety Evaluation for AREVA Inc. Topical Report ANP-10300P, Revision 0, 'AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Transient and Accident Scenarios (CAC NO. ME2979)'," September 6, 2017.

In Reference 1, the NRC issued a draft safety evaluation (SE) on ANP-10300P, Revision 0, requesting AREVA Inc. (AREVA) review the document for proprietary material and for factual errors.

AREVA reviewed the draft SE and determined that the draft SE does contain information that was identified in the topical report as being proprietary information. Attachment A to this letter provides a marked-up copy of the draft SE, showing proprietary markings and a few minor clarifications. Attachment B provides a summary table of the proprietary markings and minor clarifications.

AREVA considers some of the material contained in Attachments A and B 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.

There are no commitments within this letter or its enclosures.

AREVA appreciates this opportunity to offer clarifying comments. If you have any questions related to this information, please contact Mr. Alan Meginnis by telephone at (509) 375-8266, or by e-mail at Alan.Meginnis@areva.com

Sincerely,

Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley

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NRR

AREVA INC.

Project 728

Attachments:

Attachment A- Mark-up of draft Safety Evaluation

Attachment B- Summary Table of proposed changes for draft SE

Attachment C- Affidavit

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 these Documents is considered proprietary for the reasons set forth in paragraphs 6(b), 6(d) and 6(e) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in these Documents have 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.

Alan B. Mag...

SUBSCRIBED before me this 6th

day of November, 2017.

Hailey M. Siekawitch

Hailey M Siekawitch
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 9/28/2020

