



November 20, 2017
MJW:17:052

U.S. Nuclear Regulatory Commission
Director, Office of Nuclear Material
Safety and Safeguards
Attn: Document Control Desk
Washington, DC 20555

Dear Sirs:

**Subject: IAEA Design Information Questionnaire for AREVA Inc. Richland Facility
(Lic. No. SNM-1227; Docket No. 70-1257)**

Enclosed is a revision to the AREVA Inc. Richland facility's IAEA Design Information Questionnaire.

The information in the enclosure is proprietary in accordance with 10 CFR 2.390(d). An affidavit supporting the proprietary nature of this information is attached.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Michael Wilbricht'.

Michael Wilbricht
Sr. Safeguards Specialist

NM5520

AREVA INC.

2101 Horn Rapids Road, Richland WA 99354
Tel.: 509 375 8100 - www.aveva.com

c: Kevin Ramsey
US Nuclear Regulatory Commission
Two White Flint North
Mail Stop 4 A 60
11545 Rockville Pike
Rockville, MD 20852

Eduardo Sastre
US Nuclear Regulatory Commission
Two White Flint North
Mail Stop 4 B 16
11545 Rockville Pike
Rockville, MD 20852

David Hanks
US Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Mail Stop T-4B16
Washington, DC 20555-0001

AFFIDAVIT

STATE OF WASHINGTON)
 :
COUNTY OF BENTON) ss

Michael Wilbricht, being duly sworn on oath, states as follows:

1. I am employed by AREVA Inc. (AREVA) as the Sr Safeguards Specialist in Richland, Washington. I am responsible for the overall administration of the nuclear material control and accounting at AREVA's Richland, Washington nuclear fuel fabrication facility. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as the Sr Safeguards Specialist. This affidavit is submitted in accordance with the provisions of 10 CFR § 2.390.

2. I am familiar with the contents of the "IAEA Design Information Questionnaire", dated November 30, 2017 (E07-05-001) for the AREVA Inc., Richland, Washington Fuel Fabrication Facility, which provides facility information as required by 10 CFR § 75.10. This notification is designated as "Proprietary" by AREVA in accordance with the document control system and policies established by AREVA for the control and protection of proprietary and confidential information.

3. AREVA is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors and delivering SNM to other nuclear fuel fabricators in foreign countries for inclusion in nuclear fuel assemblies. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as AREVA. Competition among these companies including AREVA is

fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The "IAEA Design Information Questionnaire" contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in this report is commercial and confidential because it reveals specific information about the AREVA Richland manufacturing facility relative to its production throughput, processes, and capabilities. All of this information can be used by competitors to gain undue insight into AREVA's commercial relationships, probable cost structure, operations and business.

5. AREVA will suffer considerable competitive harm if the content of the "IAEA Design Information Questionnaire" is made available to AREVA's domestic and international competitors because of the potential to undermine the financial position of AREVA. Finally, this information cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 20th day of November, 2017



Michael Wilbricht
Sr. Safeguards Specialist

STATE OF WASHINGTON)
 :
) SS
COUNTY OF BENTON)

On this 20th day of November, 2017, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Michael Wilbricht to me known to be the Sr Safeguards Specialist of AREVA Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.



Mary A. Heilman
Notary Public in and for the State of Washington
residing at Richland, Washington
MY COMMISSION EXPIRES:

