



December 15, 2017
NRC:17:056

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

Response to Request for Comment on Draft SER for ANP-10333P, Revision 0, "AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod Drop Accident Scenarios"

Ref. 1: Letter, Dennis Morey (NRC) to Gary Peters (AREVA Inc.), "Draft Safety Evaluation for AREVA Inc. Topical Report ANP-10333P, Revision 0, 'AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod drop Accident Scenarios (CAC NO. MF3889)'," October 25, 2017.

In Reference 1, the NRC issued a draft safety evaluation (SE) on ANP-10333P, Revision 0, "AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod drop Accident Scenarios," 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. In addition, discussion of the draft SE with NRC Staff identified changes which needed to be made to the Topical Report (TR) for consistency with the draft SE. Attachment C contains a list of those changes and replacement pages for the TR. The approved version of the TR will be updated with these changes when it is published.

AREVA considers the material contained in the Attachments 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,

A handwritten signature in black ink, appearing to read 'G. Peters', is written over the typed name.

Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

YGO1
NRR

AREVA INC.

cc: J. G. Rowley
Project 728

Attachments:

- A. Mark-up of draft Safety Evaluation
- B. Summary Table of Proposed Changes for SER
- C. Summary Table of Proposed Changes to TR and Replacement Pages
- D. Notarized Affidavit for Withholding of Proprietary Information

AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for AREVA Inc. 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 Attachments to the Letter NRC:17:056, Entitled, 'Response to Request for Comment on Draft SER for ANP-10333P, Revision 0, "AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod Drop Accident Scenarios",' and referred to herein as "Documents." Information contained in these Documents has been classified by AREVA as proprietary in accordance with the policies established by AREVA for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and are 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 these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents 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 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 13th
day of December, 2017.

Hailey M. Siekawitch

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

