

framatome

February 23, 2018
NRC:18:007

PROSD728

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

Additional Information Regarding BAW-10247P-A, Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology For Boiling Water Reactors Supplement 2: Mechanical Methods"

- Ref. 1: Letter, Gary A. Peters (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of BAW-10247P-A, Supplement 2P, Revision 0, 'Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods'," NRC:16:012, April 29, 2016.
- Ref. 2: Letter, Dennis C. Morey (NRC) to Gary Peters (AREVA Inc.), "Draft Safety Evaluation for AREVA Inc. Topical Report BAW-10247P-A, Supplement 2P, Revision 0, 'Realistic Thermal-Mechanical Fuel Rod Methodology For Boiling Water Reactors, Supplement 2: Mechanical Methods' (CAC No. MF7708)," October 26, 2017.

Framatome Inc. (Framatome, formerly AREVA Inc.) requested the NRC's review and approval of the topical report BAW-10247P-A, Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods" in Reference 1.

Framatome is requesting approval to use Zry-2 recrystallized (RXA) material for cladding and Z4B™ material for water channels in addition to approval for the use of various mechanical models with this topical report. A telephone call was held with the NRC staff on December 15, 2017 and Framatome agreed to provide the following information:

- 1) Additional text in the topical report to clarify the use of the mechanical models for Zry-2 RXA cladding.
- 2) A description of the material properties of Z4B™ and the mechanical analysis that would be performed for Z4B™ water channels in addition to fuel assembly growth.
- 3) A summary of the additional data that Framatome has gathered for Z4B™ water channel fuel assembly growth and of the recalculation of the growth model.

Framatome understands that this information will be used to support a modification of the draft safety evaluation (Reference 2) to reflect approval 1) to use Zry-2 recrystallized material for cladding, 2) to use Z4B™ material for water channels, and 3) a higher burnup limit for the fuel assembly growth model for Z4B™ water channels. The additional information is provided in the enclosures to this letter. Framatome would appreciate the issuance of the final SE by no later than June 2018.

Framatome Inc.
3315 Old Forest Road
Lynchburg, VA 24501
Tel: (434) 832-3000

www.framatome.com

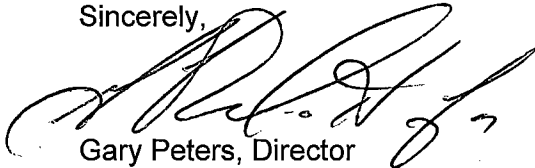
YGD1
NRR

Framatome considers some of the material contained in the enclosed documents to be proprietary. As required by 10 CFR 2.380(b), an affidavit is enclosed to support the withholding of information from public disclosure.

There are no commitments contained 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@framatome.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: J. G. Rowley
Project 728

Enclosures

1. BAW-10247P-A, Supplement 2Q2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology For Boiling Water Reactors Supplement 2: Mechanical Methods"
2. BAW-10247NP-A, Supplement 2Q2NP, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology For Boiling Water Reactors Supplement 2: Mechanical Methods"
3. Notarized Affidavit

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 Framatome to determine whether information should be classified as proprietary:

- (a) The information reveals details of Framatome'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 Framatome.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Framatome.

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

7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Framatome 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 S. Meyer

SUBSCRIBED before me this 21st

day of February, 2018.

Hailey M. Siekawitch

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

