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March 16, 2018

Serial: BSEP 18-0034

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324
Corrected Affidavit Relating to the Request for License Amendment Regarding
Core Flow Operating Range Expansion

Reference: Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory
Commission Document Control Desk, *Request for License Amendment
Regarding Core Flow Operating Range Expansion*, dated
September 6, 2016, ADAMS Accession Number ML16257A410

Ladies and Gentlemen:

By letter dated September 6, 2016 (i.e., Reference), Duke Energy Progress, LLC (Duke Energy), submitted a license amendment request (LAR) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed amendment would expand the core power-flow operating range (i.e., Maximum Extended Load Line Limit Analysis Plus (MELLLA+)).

A discrepancy was identified with the date on the Framatome affidavit regarding withholding ANP-3108P, Revision 1, *Applicability of AREVA BWR Methods to Brunswick Extended Power Flow Operating Domain* (i.e., Enclosure 14 of Reference). The enclosure to this letter provides a corrected affidavit for Framatome report ANP-3108P, Revision 1.

No new regulatory commitments are contained in this letter.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager - Regulatory Affairs, at (910) 832-2487.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on March 16, 2018.

Sincerely,

William R. Gideon

SBY/sby

Enclosure:

Framatome Affidavit Regarding Withholding Framatome Report ANP-3108P, Revision 1, *Applicability of AREVA BWR Methods to Brunswick Extended Power Flow Operating Domain*, dated February 26, 2018

cc:

U.S. Nuclear Regulatory Commission, Region II
ATTN: Ms. Catherine Haney, Regional Administrator
245 Peachtree Center Ave, NE, Suite 1200
Atlanta, GA 30303-1257

U.S. Nuclear Regulatory Commission
ATTN: Mr. Andrew Hon (Mail Stop OWFN 8G9A)
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U.S. Nuclear Regulatory Commission
ATTN: Mr. Gale Smith, NRC Senior Resident Inspector
8470 River Road
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Chair - North Carolina Utilities Commission **(Electronic Copy Only)**
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**Framatome Affidavit Regarding Withholding
Framatome Report ANP-3108P, Revision 1,
*Applicability of AREVA BWR Methods to Brunswick
Extended Power Flow Operating Domain,*
dated February 26, 2018**

A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for Framatome Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by Framatome to determine whether certain Framatome information is proprietary. I am familiar with the policies established by Framatome to ensure the proper application of these criteria.

3. I am familiar with the Framatome information contained in the report ANP-3108P, Revision 1, "Applicability of AREVA BWR Methods to Brunswick Extended Power Flow Operating Domain," dated July 2015 and referred to herein as "Document." Information contained in this Document has been classified by Framatome as proprietary in accordance with the policies established by Framatome 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 Framatome 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 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(c), 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 & Meg

SUBSCRIBED before me this 26th
day of February, 2018.

Hailey M. Siekawitch

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

