

framatome

May 1, 2018
NRC:18:015

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

Response to Request for Comment on Draft Safety Evaluation for ANP-10340P, Revision 0, "Incorporation of Chromia-Doped Fuel Properties in AREVA Approved Methods"

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (Framatome Inc.), "Draft Safety Evaluation for Framatome Inc. Topical Report ANP-10340P, Revision 0, 'Incorporation of Chromia-Doped Fuel Properties in AREVA Approved Methods' (CAC No. MF7707/EPID: L-2016-TOP-0004)," April 26, 2018.

In Reference 1, the NRC requested Framatome Inc.'s (Framatome, formerly AREVA Inc.) review and comment on the draft safety evaluation for the topical report ANP-10340P, Revision 0, "Incorporation of Chromia-Doped Fuel Properties in AREVA Approved Methods." Framatome has reviewed the draft safety evaluation and offers the enclosed comments for consideration in preparing the final safety evaluation.

A summary table of Framatome's comments on the draft safety evaluation is enclosed. A marked-up copy of the draft safety evaluation highlighting the proposed changes is enclosed.

Framatome considers some of the material contained in the enclosure to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support withholding of information from public disclosure.

There are no regulatory commitments within this letter or its enclosures.

If you have any questions related to this information, please contact Ms. Gayle Elliott, Deputy Director, Licensing & Regulatory Affairs, 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

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NRR

Enclosures:

- 1 Summary Table
- 2 Marked Copy – ANP-10340P, Revision 0, Draft Safety Evaluation - PROPRIETARY
- 3 Notarized Affidavit

Enclosure 1

Summary Table – Framatome Comments on ANP-10340P Draft Safety Evaluation

Page	Line	Proposed Change/Comment
3	22	Add proprietary brackets around the highlighted text
12	24	Add proprietary brackets around the highlighted text
13	17	Add proprietary brackets around the highlighted text
13	38	Add proprietary brackets around the highlighted text
13	42,43	Add proprietary brackets around the highlighted text

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), 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.

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SUBSCRIBED before me this 30th

day of April, 2018.

Hailey M. Siekawitch

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

