

framatome

May 31, 2018
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U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

PROJ 0728

**Response to Request for Comment on Draft Safety Evaluation for ANP-10297P-A
Revision 0, Supplement 1, "The ARCADIA[®] Reactor Analysis System for PWRs
Methodology Description and Benchmarking Results"**

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (Framatome Inc.), "Draft Safety Evaluation for Framatome Inc. Topical Report ANP-10297P-A, Revision 0, Supplement 1, 'The ARCADIA[®] Reactor Analysis System for PWRs Methodology Description and Benchmarking Results' (CAC No. MF6469/EPID: L-2015-TOP-0005)," April 5, 2018.

In Reference 1, the NRC requested Framatome Inc.'s (Framatome, formerly AREVA Inc.) review and comment on the draft safety evaluation for ANP-10297P-A Revision 0, Supplement 1, "The ARCADIA[®] Reactor Analysis System for PWRs Methodology Description and Benchmarking Results." Framatome has reviewed the draft safety evaluation and offers the enclosed comments for consideration in preparing the final safety evaluation.

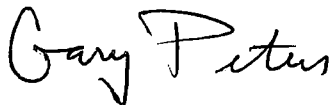
A summary table of Framatome's comments is enclosed. A marked-up copy of the draft safety evaluation highlighting the proposed changes is enclosed.

Framatome considers some of the material contained in the enclosures 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 Mr. Nathan Hottle, Product Licensing Manager, by telephone at (434) 832-3864, or by e-mail at Nathan.Hottle@framatome.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: J. G. Rowley
Project 728

YGO1
NRR

Enclosures:

- 1 Summary Table - PROPRIETARY
- 2 Marked Copy – ANP-10297P Revision 0, Supplement 1, Draft Safety Evaluation - PROPRIETARY
- 3 Notarized Affidavit

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 this Document is considered proprietary for the reasons set forth in paragraphs 6(c) and 6(d) above.

7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document has 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.

Mark E. Smith

SUBSCRIBED before me this 30th
day of May, 2018.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

