

# framatome

June 14, 2018  
NRC:18:020

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

99902041  
PRD50728

## Response to Request for Comment on Draft Safety Evaluation for ANP-10341P, "The ORFEO-GAIA and ORFEO-NMGRID Critical Heat Flux Correlations"

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (Framatome Inc.), "Draft Safety Evaluation for Framatome Inc. Topical Report ANP-10341P, 'The ORFEO-GAIA and ORFEO-NMGRID Critical Heat Flux Correlations' (CAC No. MF8400/EPID: L-2016-TOP-0008)," May 10, 2018.

In Reference 1, the NRC requested Framatome Inc.'s (Framatome, formerly AREVA Inc.) review and comment on the draft safety evaluation for ANP-10341P, "The ORFEO-GAIA and ORFEO-NMGRID Critical Heat Flux Correlations." Framatome has reviewed the draft safety evaluation and offers the enclosed comments for consideration in preparing the final safety evaluation. Framatome also intends to submit additional information to NRC for review prior to issuance of the final safety evaluation report.

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

Framatome considers some of the material contained in Enclosure 2 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](mailto:Nathan.Hottle@framatome.com).

Sincerely,



Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

cc: J. G. Rowley  
Project 728

YGD1

Enclosures:

- 1 Summary Table
- 2 Marked Copy – ANP-10341P, Draft Safety Evaluation - PROPRIETARY
- 3 Notarized Affidavit

**Summary Table – Framatome Comments on ANP-10341P Draft Safety Evaluation**

<b>Page</b>	<b>Line</b>	<b>Proposed Change/Comment</b>
11	36-38	Framatome appreciates the suggestion but questions whether it is appropriate to include in the safety evaluation report since it has no bearing on the current topical report.
16	27-28	Passage should be marked proprietary.
16	29	Recommend removal of the footnote. The derivation of the equivalence is unclear and could lead to misinterpretation. Framatome does not disagree with the added bias.
36	19-20, 28	Replace "GAIA mixing vane spacers" with "GAIA and IGM mixing grids"



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(b), 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. Hall*

SUBSCRIBED before me this 13<sup>th</sup>  
day of June, 2018.

*Sherry L. McFaden*

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

