

framatome

June 14, 2018
NRC:18:020

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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-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.

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

Page	Line	Proposed Change/Comment
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"

A F F I D A V I T

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Nathan E. Hottle. I am Manager, Product Licensing, for Framatome Inc. (Framatome) 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 following document: Enclosure 2 to Letter NRC:18:020, "Draft Safety Evaluation by the Office of Nuclear Reactor Regulation Topical Report ANP-10341P, 'The ORFEO-GAIA and ORFEO-NMGRID Critical Heat Flux Correlations'," 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 Inc. 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 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. Hattli

SUBSCRIBED before me this 13th
day of June, 2018.

Sherry L. McFaden

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

