



PROJ 0728

July 25, 2018  
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U.S. Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

**Publication of ANP-10333P-A, Revision 0, "AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod Drop Accident (CRDA)"**

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (Framatome Inc.), "Final Safety Evaluation for Topical Report ANP-10333P, Revision 0, 'AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod Drop Accident (CRDA)' (CAC No. ME3889/EPID: L-2014-TOP-0005)," March 15, 2018.

In Reference 1 the NRC accepted the topical report ANP-10333P, Revision 0, "AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod Drop Accident (CRDA)" for referencing in license applications, and requested that Framatome Inc. (Framatome, formerly AREVA Inc.) publish the report as an "A" version. One proprietary version and one nonproprietary version are provided with this letter.

The published report is constructed in accordance with guidance provided on the NRC website at the time the SE was transmitted to Framatome. Framatome has used the change page process to produce this approved version of the TR rather than revising the TR. A nature of changes page describing the changed pages is inserted in front of the changed pages at the end of the report.

Framatome considers some of the material contained in the enclosed documents to be proprietary. As required by 10 CFR 2.380(b), an affidavit is enclosed to support the withholding of information from public disclosure.

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

If you have any questions related to this information, please contact Mr. Alan Meginnis by telephone at (509) 375-8266, or by e-mail at [Alan.Meginnis@framatome.com](mailto:Alan.Meginnis@framatome.com).

Sincerely,

Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

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cc: J. G. Rowley  
Project 728

Enclosures:

1. Proprietary copy of ANP-10333P-A, Revision 0, " AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod Drop Accident (CRDA)"
2. Non-proprietary copy of ANP-10300NP-A, Revision 1, " AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod Drop Accident (CRDA)"
3. Notarized Affidavit for Withholding of Proprietary Information

## AFFIDAVIT

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-10333P-A, Revision 0, "AURORA-B: An Evaluation Model for Boiling Water Reactors; Application to Control Rod Drop Accident (CRDA)," dated March 2018 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(b), 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 B. Meyers

SUBSCRIBED before me this 19

day of July, 2018.

Hailey M. Siekawitch

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

