

framatome

PROJ0728

July 25, 2018
NRC:18:029

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

Request for Review and Approval of EMF-93-177 Revision 1 Supplement 2P Revision 1, "Mechanical Design for BWR Fuel Channels: Z4B Material"

Framatome Inc. (Framatome) requests the NRC's review and approval of the topical report EMF-93-177 Revision 1 Supplement 2P Revision 1, "Mechanical Design for BWR Fuel Channels: Z4B Material" for referencing in licensing actions.

Excessive control blade friction due to abnormal fuel channel bow remains a significant technical challenge to the BWR industry. As part of the efforts to resolve this issue, Framatome has developed a new zirconium alloy, Z4B, which demonstrates improved bow performance relative to Zry-2 and Zry-4 fuel channels. The topical report EMF-93-177 Revision 1 Supplement 2P Revision 1 is a follow-on to the topical report ANP-10336P-A Revision 0, "Z4B™ Fuel Channel Irradiation Program" to support the use of the Z4B channel material in batch quantities.

Framatome would appreciate NRC approval of this topical report by July 2019.

Framatome considers some of the material contained in Enclosure 1 to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support withholding information from public disclosure.

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

If you have any questions related to this submittal, please contact Ms. Gayle F. Elliott, Deputy Director, Licensing and 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

Framatome Inc.
3315 Old Forest Road
Lynchburg, VA 24501
Tel: (434) 832-3000

www.framatome.com

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Enclosures:

1. EMF-93-177 Revision 1 Supplement 2P Revision 1, "Mechanical Design for BWR Fuel Channels: Z4B Material" (PROPRIETARY)
2. EMF-93-177 Revision 1 Supplement 2NP Revision 1, "Mechanical Design for BWR Fuel Channels: Z4B Material" (NON-PROPRIETARY)
3. Notarized Affidavit

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 EMF-93-177, Revision 1, Supplement 2P, Revision 1 "Mechanical Design for BWR Fuel Channels: Z4B Material," dated July 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(a), 6(b), 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.

Alan & Meg

SUBSCRIBED before me this 25th

day of July, 2018.

Hailey M. Siekawitch

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

