

framatome

August 31, 2018
NRC:18:034

PROJ0728
99902041

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

Publication of BAW-10247P-A Supplement 2P-A, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods"

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (Framatome Inc.), "Final Safety Evaluation for Topical Report BAW-10247P-A, Supplement 2P, Revision 0, 'Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors, Supplement 2: Mechanical Methods' (CAC No. MF7708; EPID L-2016-TOP-0005)," August 15, 2018.

In Reference 1 the NRC accepted the topical report BAW-10247P-A Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods" for referencing in license applications and requested that Framatome Inc. (Framatome, formerly AREVA Inc.) publish the report as an "A" version within three months. One proprietary version and one non-proprietary version are provided with this letter.

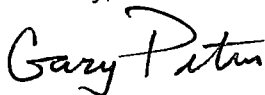
The published report is constructed in accordance with guidance provided on the NRC website.

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 Ms. Gayle Elliott, Deputy Director, Licensing & 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

Y GDI
NRR

Enclosures

1. Proprietary copy of BAW-10247P-A Supplement 2P-A, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods"
 2. Non-proprietary copy of BAW-10247NP-A Supplement 2NP-A, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods"
 3. Notarized Affidavit for Withholding of Proprietary Information
-

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 E. Meg

SUBSCRIBED before me this 29th
day of August, 2018.

Hailey M. Siekawitch

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

