

framatome

PROJ 0728

September 18, 2018
NRC:18:035

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

Informational Transmittal of ANP-3653P Revision 0, "Fuel Design Evaluation for ATRIUM 11 BWR Reload Fuel" and ANP-2637P Revision 7, "Boiling Water Reactor Licensing Methodology Compendium"

- Ref. 1: ANF-89-98(P)(A) Revision 1 and Supplement 1, "Generic Mechanical Design Criteria For BWR Fuel Designs," Advanced Nuclear Fuels Corporation, May 1995.
- Ref. 2: Letter, James F. Mallay (SPC) to Document Control Desk (NRC), "Revision to Attachment 1 of Letter NRC:99:030, Request for Concurrence on SER Clarifications," NRC:99:045, October 12, 1999.
- Ref. 3: Letter, Stuart Richards (NRC) to James F. Mallay (SPC), "Siemens Power Corporation Re: Request for Concurrence on Safety Evaluation Report Clarifications (TAC No. MA6160)," May 31, 2000.

Enclosed for the NRC's information is ANP-3653P, Revision 0, "Fuel Design Evaluation for ATRIUM 11 BWR Reload Fuel" dated September 2018, and ANP-2637P Revision 7, "Boiling Water Reactor Licensing Methodology Compendium," dated September 2018.

As specified in References 1, 2 and 3, Framatome Inc. (Framatome) is required to provide the NRC an informational summary of the evaluation of new BWR fuel designs against the NRC-approved acceptance criteria. This submittal serves that purpose for the new Framatome ATRIUM 11 BWR fuel design.

Additionally, an updated revision of the Framatome BWR Licensing Methodology Compendium is provided. The compendium revision is updated to include the advanced methods which are required to support the ATRIUM 11 Fuel Design. These documents are submitted for information only and are not being submitted for review. As such, no review fee or separate Safety Evaluation (SE) is expected.

Framatome considers these reports to be proprietary in their entirety. As such, only a proprietary version of each report is enclosed. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

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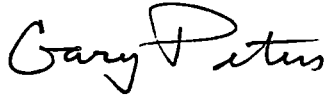
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There are no new commitments contained within this letter or its enclosures.

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

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: J. G. Rowley
Project 728

Enclosures :

- 1 ANP-3653P Revision 0, "Fuel Design Evaluation for ATRIUM 11 BWR Reload Fuel"
- 2 ANP-2637P Revision 7, "Boiling Water Reactor Licensing Methodology Compendium"
- 3 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 ANP-3653P Revision 0, "Fuel Design Evaluation for ATRIUM 11 BWR Reload Fuel," dated September 2018 and the Report ANP-2637P Revision 7, " Boiling Water Reactor Licensing Methodology Compendium," dated September 2018 and referred to herein as "Documents." Information contained in these Documents 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. These Documents contain information of a proprietary and confidential nature and are 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 these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents 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 these Documents 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 these Documents 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. Meyer

SUBSCRIBED before me this 10th
day of September, 2018.

Hailey M. Siekawitch

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

