

# framatome

September 21, 2018  
NRC:18:036

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

## **Request for Review and Approval of ANP-10337, Revision 0, Supplement 1P, Revision 0, "Deformable Spacer Grid Element"**

Framatome Inc. (Framatome) requests the NRC's review and approval of the topical report ANP-10337, Revision 0, Supplement 1P, Revision 0, "Deformable Spacer Grid Element" for referencing in licensing actions.

The topical report ANP-10337, Revision 0, Supplement 1P, Revision 0 describes an extension to the base approved topical report (ANP-10337P-A) to support the use of a deformable spacer grid element.

Framatome would appreciate NRC approval of this topical report by September 2020.

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 of 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 Directory, Licensing & Regulatory Affairs). She may be reached by telephone at (434) 832-3347 or by e-mail at [Gayle.Elliott@framatome.com](mailto:Gayle.Elliott@framatome.com).

Sincerely,



Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

cc: J. G. Rowley  
Project 728

### Enclosures:

- 1 ANP-10337, Revision 0, Supplement 1P, Revision 0 (PROPRIETARY)
- 2 ANP-10337, Revision 0, Supplement 1NP, Revision 0 (NON-PROPRIETARY)
- 3 Notarized Affidavit

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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(a), 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. Kahl

SUBSCRIBED before me this 26<sup>th</sup>  
day of September, 2018.

Heidi H Elder

Heidi Hamilton Elder  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 12/31/2022  
Reg. # 7777873

