

# framatome

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PROJ0728

December 20, 2018  
NRC:18:045

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

**Response to Request for Additional Information Regarding ANP-10323P Revision 0,  
"Fuel Rod Thermal-Mechanical Methodology for Boiling Water Reactors and Pressurized  
Water Reactors"**

- Ref. 1: Letter, Jonathan G. Rowley (NRC) to Gary Peters (AREVA Inc.), "Request for Additional Information Re: AREVA NP, Inc. Topical Report ANP-10323P, 'Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors' (TAC No. MF2545)," March 25, 2016.
- Ref. 2: Gary Peters (Framatome Inc.) to Document Control Desk (NRC), "Request for Resumption of Review of ANP-10323P Revision 1, 'GALILEO Fuel Rod Thermal-Mechanical Methodology for Pressurized Water Reactors'," NRC:18:026, June 29, 2018.

The NRC requested additional information regarding ANP-10323P Revision 0 in Reference 1. A partial response to this request is enclosed with this letter. As discussed in the April 24, 2018 public meeting, request for additional information (RAI) responses will be provided in batches. As a result of the November 29, 2018 audit, some of the RAI responses in the first batch have been deferred to early 2019 so that additional information needed for the review can be provided. The schedule for this second batch submittal will be communicated verbally to the NRC project manager.

The RAI responses in the enclosure reflect Revision 1 of ANP-10323P (Reference 2).

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. A non-proprietary version is included as Enclosure 2.

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

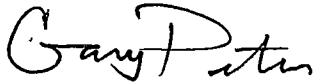
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NRR

If you have any questions related to this information, please contact Mr. Nathan Hottle, Product Licensing Manager, by telephone at (434) 832-3864, or by e-mail at [Nathan.Hottle@framatome.com](mailto:Nathan.Hottle@framatome.com).

Sincerely,



Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

cc: J. G. Rowley  
Project 728

Enclosures:

- 1 ANP-10323 Rev. 1, Q1P Revision 0 (Proprietary)
- 2 ANP-10323 Rev. 1, Q1NP Revision 0 (Non-Proprietary)
- 3 Notarized Affidavit

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA    )  
                                                  ) ss.  
CITY OF LYNCHBURG                    )

1. My name is Nathan E. Hottle. I am Manager, Product Licensing, for Framatome Inc. (Framatome) 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 following document: ANP-10323 Rev.1 Q1P Rev 0, "Response to Request for Additional Information – ANP-10323P," 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 Inc. 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 this Document is considered proprietary for the reasons set forth in paragraphs 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.

Ma E Koffe

SUBSCRIBED before me this 18  
day of December, 2018.

Heidi H Elder

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

