framatome

January 9, 2019
MJW:19:006

U.S. Nuclear Regulatory Commission
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
Attn: Document Control Desk
11555 Rockville Pike
One White Flint North
Rockville, MD 20852

Subject: IAEA Design Information Questionnaire for Framatome Inc. Richland Facility (Lic. No. SNM-1227; Docket No. 70-1257)

Enclosed is a revision to the AREVA Inc. Richland facility's IAEA Design Information Questionnaire.

The information in the enclosure is proprietary in accordance with 10 CFR 2.390(d). An affidavit supporting the proprietary nature of this information is attached.

Very truly yours,

Michael J. Wilbricht
Sr. Safeguards Specialist

c: K. Ramsey, U.S. NRC w/ attachments
E. Sastre, U.S. NRC w/ attachments
D. Hanks, U.S. NRC w/ attachments

Attachments

1. IAEA UYUD DIQ, E07-05-001
2. Proprietary Information Affidavit, Wilbricht January 9, 2019

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Richland, WA 99354
Tel: (509) 375-8100

www.framatome.com

NMSS20

STATE OF WASHINGTON)
: ss
COUNTY OF BENTON)

Michael J. Wilbricht, being duly sworn on oath, states as follows:

1. I am employed by Framatome Inc. (Framatome) as the Sr. Safeguards Specialist in Richland, Washington. I am responsible for the overall administration of the nuclear material control and accounting at Framatome's Richland, Washington nuclear fuel fabrication facility. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as the Sr. Safeguards Specialist. This affidavit is submitted in accordance with the provisions of 10 CFR § 2.390.

2. I am familiar with the contents of the "IAEA UYUD DIQ", E07-05-001, which provides nuclear material control information for the Framatome Inc., Richland, Washington Fuel Fabrication Facility as required by 10 CFR § 74.31. This document has been classified and designated as "Proprietary" by Framatome in accordance with the document control system and policies established by Framatome for the control and protection of proprietary and confidential information.

3. Framatome is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as Framatome. Competition among these companies including Framatome is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The "IAEA UYUD DIQ" contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in this report is commercial and confidential because it reveals specific information about the Framatome Richland manufacturing facility relative to its production throughput. All of this information can be used by competitors to gain undue insight into Framatome's commercial relationships, probable cost structure, operations and business.

5. Framatome Inc. will suffer considerable competitive harm if the contents of "IAEA UYUD DIQ" are made available to Framatome domestic and international competitors. Finally, this material cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 9th day of January, 2019.

Michael J. Wilbricht
Sr. Safeguards Specialist

STATE OF WASHINGTON)
: ss
COUNTY OF BENTON)

On this 9th day of January, 2019, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Michael Wilbricht to me known to be the Sr. Safeguards Specialist of Framatome Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.

Mary Anne Heilman
Notary Public in and for the State of Washington,
residing at Kennewick, Washington.
My commission expires: June 6, 2020

Mary Anne Heilman
Commission Expires
Notary
Public
06-06-2020
State of Washington