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

Response to Request for Additional Information Regarding ANP-10346P, Revision 0, "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA"

- Ref. 1: Letter, Gary Peters (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10346P, Revision 0, 'ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA'," NRC:17:055, December 15, 2017.
- Ref. 2: Letter, Jonathan G. Rowley (NRC) to Gary Peters (Framatome), "Request for Additional Information Regarding Framatome Inc. Topical Report ANP-10346P, Revision 0, 'ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA' (EPID: 2017-TOP-0067)," September 21, 2018.

Framatome Inc. (Framatome, formerly AREVA Inc.) requested the NRC's review and approval of the topical report ANP-10346P Revision 0, "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA" in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2. The response to this RAI is enclosed with this letter.

Framatome considers some of the information contained in the enclosed documents to be proprietary. As required by 10 CFR 2.390(b) an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the RAI responses are enclosed.

There are no commitments 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.

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T007
NRR

cc: J. G. Rowley
Project 728

Enclosures:

1. ANP-10346Q1P, Revision 0 "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA Response to Request for Additional Information"
2. ANP-10346Q1NP, Revision 0 "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA Response to Request for Additional Information"
3. Notarized Affidavit

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.

Maestro E. Nott

SUBSCRIBED before me this 5
day of March, 2019.

Heidi H Elder

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

