

framatome

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

Response to Request for Supplemental Information Regarding ANP-10339P, Revision 0, "ARITA – ARTEMIS/RELAP Integrated Transient Analysis Methodology"

- Ref. 1: Letter, Gary Peters (Framatome) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10339P, 'ARITA – ARTEMIS/RELAP Integrated Transient Analysis Methodology'," NRC:18:033, August 28, 2018.
- Ref. 2: Letter, Jonathan Rowley (NRC) to Gary Peters (Framatome), "Acceptance of Review of Framatome Inc. Topical Report ANP-10339P, 'ARITA – ARTEMIS/RELAP Integrated Transient Analysis Methodology' (EPID: L-2018-TOP-0034)," December 18, 2018.

Framatome Inc. (Framatome) requested the NRC's review and approval of the topical report ANP-10339P, Revision 0, "ARITA – ARTEMIS/RELAP Integrated Transient Analysis Methodology" in Reference 1. The NRC accepted the report for review in Reference 2. In the acceptance letter, the NRC identified the need for supplemental information to support their review. The response to this request for supplemental information 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 supplemental information 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.

cc: J. G. Rowley

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Enclosures:

1. ANP-10339Q1P, Revision 0, "Response to Request for Supplemental Information – ANP-10339P"
2. ANP-10339Q1NP, Revision 0, "Response to Request for Supplemental Information – ANP-10339P"
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-10339Q1P Revision 0, "Response to Request for Supplemental Information – ANP-10339P," 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 paragraph 6(b) 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.

Walter E. Roth

SUBSCRIBED before me this 12
day of March, 2019.

Heidi H Elder

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

