

framatome

May 7, 2019
MJW:19:016

U.S. Nuclear Regulatory Commission
Director, Office of Nuclear Material
Safety and Safeguards
Attn: Document Control Desk
Washington, DC 20555

Subject: NRC Form 327 for AREVA Inc. (Lic. No. SNM-1227; Docket No. 70-1257)

Enclosed are completed NRC Form 327s which report the results of our material balance accounting and SEID calculations for the period March 20, 2018 to March 18, 2019.

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.

Best regards,



Michael Wilbricht
Sr Safeguards Specialist

NM5520

Explanatory Notes

LEU

1. It is assumed that the non-measurement contribution to SEID is equal to the measurement contribution.
2. The PPA is to remove transaction YUD-YUD-781 from the raw ID. Transaction 781 was for items not included in the prior period ending inventory.
3. The SEID limit is computed as 0.177 percent of line 11a.
4. The LEID limit is computed as 0.250 percent of line 11a.

HEU

1. The LEID and SEID are estimated to be 1 gram U and 1 gram U235 based on qualitative review of errors in liquid concentrations, volume and mass measurements, analytical %U and %U235 measurements, and comparisons to standard certificates.
2. The SEID limits are set to their alternate limits of 6,400 grams U235 and 200,000 grams U per NUREG/BR-0096.
3. The LEID limits are similarly set to 9,000 grams U235 and 300,000 grams U.
4. The ID limit is set to the 10-CFR-74.51 license minimum ID limit of 300 grams U235.

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c: Kevin Ramsey
US Nuclear Regulatory Commission
Two White Flint North
Mail Stop 4 A 60
11545 Rockville Pike
Rockville, MD 20852

AFFIDAVIT

STATE OF WASHINGTON)
 :
COUNTY OF BENTON) SS

Michael 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 "Special Nuclear Material (SNM) and Source Material (SM) Physical Inventory Summary Report", dated May 7, 2019 (MJW-19-016) for the Framatome Inc., Richland, Washington Fuel Fabrication Facility, which provides summary reporting of the plant's annual SNM inventory as required by 10 CFR § 74.17. This notification is 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 and delivering SNM to other nuclear fuel fabricators in foreign countries for inclusion in nuclear fuel assemblies. 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 "Special Nuclear Material (SNM) and Source Material (SM) Physical Inventory Summary Report" 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 will suffer considerable competitive harm if the content of the "Special Nuclear Material (SNM) and Source Material (SM) Physical Inventory Summary Report" is made available to Framatome's domestic and international competitors because of the potential to undermine the financial position of Framatome. Finally, this information cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 8th day of May, 2019



Michael Wilbricht
Sr. Safeguards Specialist

STATE OF WASHINGTON)
 : ss
COUNTY OF BENTON)

On this 8th day of May, 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 A. Heilman
Notary Public in and for the State of Washington
residing at Richland, Washington.
MY COMMISSION EXPIRES:

