

# framatome

June 20, 2019  
NRC:19:015

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

**Response to Request for Comment on Draft Safety Evaluation for ANP-10346P,  
Revision 0, "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA"**

Ref. 1: Letter Dennis Morey (NRC) to Gary Peters (Framatome Inc.) "Draft Safety Evaluation for Framatome Inc. Topical Report ANP-10346, Revision 0, 'ATWS-I Analysis Methodology for Boiling Water Reactors Using RAMONA5-FA,' (EPID: L-2017-TOP-0067)," May 10, 2019.

In Reference 1, the NRC issued a draft safety evaluation (SE) on ANP-10346, Revision 0, requesting Framatome Inc. (Framatome) review the document for proprietary material and for factual errors or clarity concerns.

Framatome has reviewed the draft SE and determined that the draft SE does contain information that was identified in the topical report as proprietary information. Enclosure 1 to this letter provides a summary table of the proposed proprietary markings and minor clarifications. Enclosure 2 provides a marked-up copy of the draft SE, showing the proposed proprietary markings and a few minor clarifications.

Framatome considers the material contained in the Enclosures 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.

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

If you have any questions related to this information, please contact Mr. Alan B. Meginnis by telephone at (509) 375-8266, or by e-mail at [alan.meginnis@framatome.com](mailto:alan.meginnis@framatome.com).

Sincerely,



Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

cc: J. G. Rowley  
Project 728

YGOI  
NRR

Enclosures:

1. Summary Table of minor clarifications
2. Mark-up of draft Safety Evaluation

AFFIDAVIT

STATE OF WASHINGTON )  
                                  ) ss.  
COUNTY OF BENTON   )

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for Framatome Inc. 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 Enclosures to the Letter NRC:19:015 Entitled, 'Response to Request for Comment on Draft Safety Evaluation for ANP-10346P, Revision 0, "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA,"' dated June, 2019 and 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 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 the Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(d) and 6(e) above.

7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document have 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.

Alan E. Meyer

SUBSCRIBED before me this 17  
day of June, 2019.

Katherine Kerr

Katherine Kerr  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 9/12/2022

