

September 27, 2019
NRC:19:025

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

Fourth Response to Request for Additional Information Regarding ANP-10323P, Revision 0, "Fuel Rod Thermal-Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors"

- Ref. 1: Letter, Jonathan Rowley (NRC) to Gary Peters (AREVA Inc.), "Request for Additional Information Re: AREVA NP, Inc. Topical Report ANP-10323P, 'Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors' (TAC No. MF2545)," March 25, 2016.
- Ref. 2: Letter, Gary Peters (Framatome Inc.) to Document Control Desk (NRC), "Response to Request for Additional Information Regarding ANP-10323P Revision 0, 'Fuel Rod Thermal-Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors'," NRC:18:045, December 20, 2018.
- Ref. 3: Letter, Gary Peters (Framatome Inc.) to Document Control Desk (NRC), "Second Response to Request for Additional Information Regarding ANP-10323P, Revision 0, 'Fuel Rod Thermal-Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors'," NRC:19:001, January 31, 2019.
- Ref. 4: Letter, Gary Peters (Framatome Inc.) to Document Control Desk (NRC), "Third Response to Request for Additional Information Regarding ANP-10323P, Revision 0, 'Fuel Rod Thermal-Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors'," NRC:19:016, June 28, 2019.

The NRC requested additional information regarding ANP-10323P in Reference 1. As discussed in the April 24, 2018 public meeting, request for additional information (RAI) responses will be provided in batches. The first, second, and third batches were provided in References 2, 3 and 4. A fourth and final batch is enclosed with this letter.

The RAI responses in the enclosure reflect Revision 1 of ANP-10323P that was submitted to the NRC on June 29, 2018.

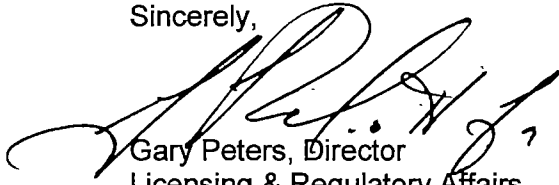
Framatome considers some of the material contained in Enclosure 1 to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support withholding of information from public disclosure. A non-proprietary version is included as Enclosure 2.

✓ GDI
NRR

There are no regulatory 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
Project 728

Enclosures:

- 1 ANP-10323, Revision 1, Q4P, Revision 0 (Proprietary)
- 2 ANP-10323, Revision 1, Q4NP, Revision 0 (Non-Proprietary)
- 3 Notarized Affidavit

AFFIDAVIT

1. My name is Gayle Elliott. I am Deputy Director, Licensing & Regulatory Affairs, 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 ANP-10323, Revision 1, Q4P, Revision 0, entitled, "Response to Request for Additional Information – ANP-10323P, 'GALILEO Fuel Rod Thermal-Mechanical Methodology for Pressurized Water Reactors'," dated September 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:

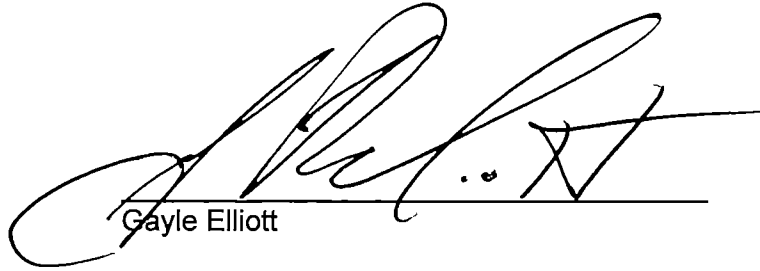
- (a) The information reveals details of Framatome's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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 this Document is considered proprietary for the reasons set forth in paragraphs 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 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.


Gayle Elliott

Commonwealth of Virginia)
) ss.
City of Lynchburg)

SUBSCRIBED before me this 27 day of September, 2019.

Heidi Hamilton Elder

Heidi Elder
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 12/31/22
Reg. # 7777873