

framatome

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October 31, 2019
NRC:19:027

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

Request for Review and Approval of ANP-10344P, Revision 0, "Framatome Best-estimate Enhanced Option III Methodology"

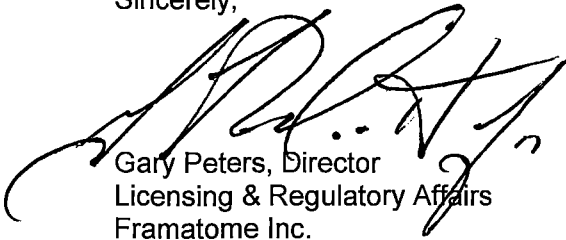
Framatome Inc. (Framatome) requests NRC review and approval of Topical Report ANP-10344P, Revision 0, "Framatome Best-estimate Enhanced Option III Methodology" for referencing in licensing actions. This topical presents a statistical methodology that can be used by the industry to reduce the probability of spurious reactor scrams while still ensuring that fuel design limits are protected by the long-term stability solution detect and suppress hardware.

Framatome considers some of the material contained in the enclosed document 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 report are enclosed.

There are no commitments within this letter or its enclosures.

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

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: J. G. Rowley
Project 728

Attachments:

1. Proprietary copy of ANP-10344P, Revision 0,
2. Non-Proprietary copy of ANP-10344NP, Revision 0
3. Notarized Affidavit

Framatome Inc.
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Lynchburg, VA 24501
Tel: (434) 832-3000

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T007
YB01
NRR

bcc: NRC:19:027
T Point: T4.12.2
Contract:

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Kevin	S.	Quick
Robert	R.	Schnepf
Dan	R.	Tinkler
Scott		Wilkerson

AFFIDAVIT

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 report ANP-10344P Revision 0, "Framatome Best-estimate Enhanced Option III Methodology," dated October 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:

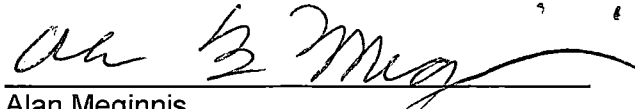
- (a) The information reveals details of Framatome's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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(a), 6(b), 6(c), 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.

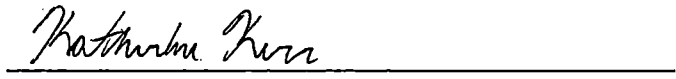
8. Framatome policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.


Alan Meginnis

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

SUBSCRIBED before me this 31 day of October, 2019.



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

