

framatome

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June 30, 2020
NRC:20:014

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-10337,
Revision 0, Supplement 1P, Revision 0, "Deformable Spacer Grid Element"**

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (Framatome Inc.), "Draft Safety Evaluation for Framatome Inc. Topical Report ANP-10337, Revision 0, Supplement 1P, Revision 0, 'Deformable Spacer Grid Element' (EPID: L-2018-TOP-0037)," June 5, 2020.

In Reference 1, the NRC requested Framatome Inc.'s (Framatome) review and comment on the draft safety evaluation for the topical report ANP-10337, Revision 0, Supplement 1P, Revision 0, "Deformable Spacer Grid Element." Framatome has reviewed the draft safety evaluation and offers the enclosed comments for consideration in preparing the final safety evaluation.

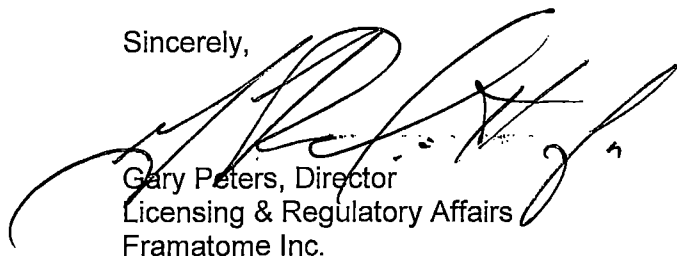
A summary table of Framatome's comments on the draft safety evaluation is attached. A marked-up copy of the draft safety evaluation highlighting the proposed changes is enclosed.

Framatome considers some of the material contained in the enclosure to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support withholding of 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 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: N. Otto
Project 728

Enclosures:

- 1 Marked-up Copy – ANP-10337, Revision 0, Supplement 1P, Revision 0, Draft Safety Evaluation – PROPRIETARY
- 2 Notarized Affidavit

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NRR

Summary Table – Comments on ANP-10337, Revision 0, Supplement 1P, Revision 0, Draft Safety Evaluation

Page	Paragraph	Proposed Change/Comment
1	1	Change "Supplement 1" to "Supplement 1P" as shown on mark-up page
2	2	Change "ANP-10337P" to "ANP-10337" as shown on mark-up page
3	Second from last	Change buckling to indicated words on mark-up page
3	Second from last	Add proprietary brackets as shown on mark-up page
3	last	Add proprietary brackets as shown on mark-up page
4	First	Add proprietary brackets as shown on mark-up page
4	Fourth	Add proprietary brackets as shown on mark-up page
4	Fourth	Change "ANP-10337P" to "ANP-10337" as shown on mark-up
5	First	Add the word "is" after the word "methods" as shown on mark-up page
5	Last	Add proprietary brackets as shown on mark-up page
6	First	Add proprietary brackets as shown on mark-up page
6	Second	Add proprietary brackets as shown on mark-up page
6	Third	Add proprietary brackets as shown on mark-up page
6	Last	Add proprietary brackets as shown on mark-up page
7	First	Add proprietary brackets as shown on mark-up page
7	Second from last	Change "Reference 7" to "Reference 6" as shown on mark-up page
8	Third	Change "the three specified materials" to "the two specified materials" as shown on mark-up page
8	Fifth	Change "ANP-10337P-A" to ANP-10337," as shown on mark-up page
8	Fifth	Change "the two supplements" to "the two RAI responses" as shown on mark-up page
8	Sixth	Change "ANP-10337P" to ANP-10337" as shown on mark-up page

A F F I D A V I T

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 the attachment to a Letter from Gary Peters (Framatome) to Document Control Desk (NRC), entitled, "Response to Request for Comment on Draft Safety Evaluation for ANP-10337, Revision 0, Supplement 1P, Revision 0, 'Deformable Spacer Grid Element'," NRC:20:014, dated June 2020, 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.

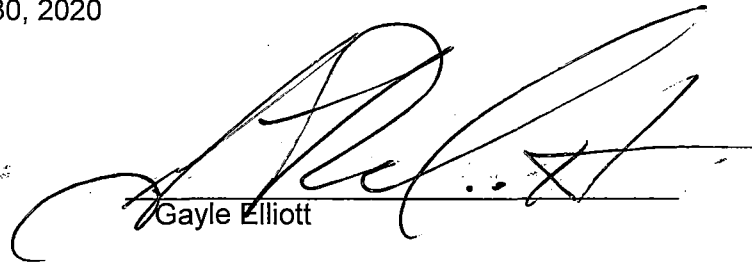
7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited 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.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 30, 2020



Gayle Elliott