## framatome

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June 30, 2020 NRC:20:012

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

Request for Review and Approval of Errata to BAW-10241PA, Revision 1, "BHTP DNB Correlation Applied with LYNXT Topical Report"

Ref. 1: BAW-10241(P)(A), Revision 1, "BHTP DNB Correlation Applied with LYNXT Topical Report," July 2005.

Framatome Inc. (Framatome) identified an issue relating to the LYNXT implementation of CHF data from one of the tests referenced in BAW-10241PA, Revision 1, "BHTP DNB Correlation Applied with LYNXT Topical Report," (Reference 1). This issue was discussed in a meeting with the NRC on December 18. 2019. Enclosure 1 of this letter captures the correction to the data.

Additionally, the enclosed Errata proposes some minor changes to BAW-10241PA, Revision 1, that have no material impact on the correlation or the released safety evaluation.

This Errata submittal is consistent with the NRC's definition of a Reduced Scope Topical Report and as such would meet the criteria for a Simplified Safety Evaluation as discussed in the workshop on transforming the topical report review process on October 24, 2019. Due to the narrow scope of review, Framatome would appreciate NRC approval of this Errata by September 2020 to support customer applications.

Upon issuance of the Simplified Safety Evaluation, the contents of the Errata will be incorporated into an approved Revision 2 of the topical report.

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.

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.

Sincereix Gary Peters, Director Licensing & Regulatory Affairs

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cc: N. Otto Project 728

Enclosures:

- 1 BAW-10241PA, Revision 1, Errata 2P, Revision 0 (Proprietary)
- 2 BAW-10241NPA, Revision 1, Errata 2NP, Revision (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 BAW-10241PA, Revision 1, Errata 2P, Revision 0, entitled, "BHTP DNB Correlation Applied with LYNXT Topical Report," 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

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