



July 21, 2020
NRC:20:015

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

Additional Information Regarding ANP-10323P, Revision 1, "Fuel Rod Thermal-Mechanical Methodology for Pressurized Water Reactors"

Ref. 1: Gary Peters (Framatome Inc.) to Document Control Desk (NRC), "Request for Resumption of Review of ANP-10323P, Revision 1, 'GALILEO Fuel Rod Thermal-Mechanical Methodology for Pressurized Water Reactors'," NRC:18:026, June 29, 2018.

A telephone call was held with the NRC staff on May 14, 2020 to discuss preliminary limitations and conditions in the NRC safety evaluation for ANP-10323P, Revision 1, "Fuel Rod Thermal-Mechanical Methodology for Pressurized Water Reactors," submitted in Reference 1.

Framatome stated in the telephone call that additional information would be provided to support removal of some of the limitations and conditions. The additional information is provided in Enclosure 1 to this letter,

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 the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the enclosed document are provided.

There are no commitments within this letter or its enclosures.

If you have any questions related to this information please contact Ms. Gayle F. Elliott, Deputy Director, Licensing & Regulatory Affairs, by telephone at (434) 832-3347, or by e-mail at Gayle.Elliott@framatome.com.

Sincerely,

A handwritten signature in blue ink that reads "Gary Peters".

Gary Peters, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: N. Otto
Project 728

Framatome Inc.
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Lynchburg, VA 24501
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Enclosures:

- 1) Proprietary copy of ANP-10323, Revision 1, Q5P Revision 0
- 2) Non-Proprietary copy of ANP-10323, Revision 1, Q5NP Revision 0
- 3) Notarized Affidavit for withholding of proprietary information

bcc: NRC:20:015
T Point: T4.12.2

Chris	C.	Allison
Tony	C.	Attard
Philippe	M.	Bellanger
Marty	C.	Bryan
Morris	E.	Byram
Heidi	H.	Elder
Gayle	F.	Elliott
Robert	S.	Freeman
Michael		Harris
Jerald	S.	Holm
Nathan	E.	Hottle
Ronda	M.	Lane
William	L.	Maxson
Alan	B.	Meginnis
Phil	A.	Opsal
Tiffany	N	Paradise
Gary	A.	Peters
Jackie	N.	Stevens
Nicolas		Vioujard
Scott		Wilkerson

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), formerly AREVA NP 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 ANP-10323P, Revision 1, Q5P, Revision 0, entitled, "Additional Information – ANP-10323P GALILEO Fuel Rod Thermal-Mechanical Methodology for Pressurized Water Reactors," dated July 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: July 16, 2020

Gayle Elliott

Gayle Elliott