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

**Response to Request for Additional Information Regarding ANP-10349P, Revision 0, "GALILEO Implementation in LOCA Methods"**

- Ref. 1: Letter, Gary Peters (Framatome Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10349P, Revision 0, 'GALILEO Implementation in LOCA Methods'," NRC:20.023, October 7, 2020.
- Ref. 2: Letter, Ngola Otto (NRC) to Gary Peters (Framatome Inc.), "Request for Additional Information Regarding Framatome Topical Report, ANP-10349P, Revision 0, 'GALILEO Implementation in LOCA Methods' (EPID L-2020-TOP-0059)," March 23, 2021.

Framatome Inc. (Framatome) requested the NRC's review and approval of the topical report ANP-10349P, Revision 0, "GALILEO Implementation in LOCA Methods" in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2. A response to the RAI is enclosed with 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 RAI response 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](mailto:Gayle.Elliott@framatome.com).

Sincerely,

Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

cc: N. Otto  
Project 728

Y/GOI  
T007  
NRR

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Attachments:

1. Proprietary copy of ANP-10349, Revision 0, Q1P, Revision 0
2. Non-proprietary copy of ANP-10349, Revision 0, Q1NP, Revision 0
3. Affidavit for withholding of proprietary information



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: April 23, 2021

  
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Gayle Elliott