

framatome

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May 28, 2021
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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-10348P,
Revision 0, "Fluence Methodologies for SLR (Subsequent License Renewal)"**

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (Framatome Inc.), "Draft Safety Evaluation for Framatome Topical Report ANP-10348P, 'Fluence Methodologies for SLR [Subsequent License Renewal] (EPID L-2020 -TOP-0045)'," May 6, 2021.

In Reference 1, the NRC requested Framatome Inc.'s (Framatome) review and comment on the draft safety evaluation for the topical report ANP-10348P, "Fluence Methodologies for SLR [Subsequent License Renewal]." 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 provided in Enclosure 1. A marked-up copy of the draft safety evaluation highlighting the proposed comments and additional proprietary markings is provided in Enclosure 2.

Framatome considers some of the material contained in the enclosures 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 Mr. Philip Opsal, Manager, Product Licensing, Framatome Inc. Licensing & Regulatory Affairs, by telephone at (434) 832-3684, or by e-mail at Philip.Opsal@framatome.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: N. Otto
Project 728

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NRR

Enclosures:

1. Comments on Draft Safety Evaluation for ANP-10348P, Revision 0
2. Marked-up Copy – ANP-10348, Revision 0, Draft Safety Evaluation – PROPRIETARY
3. Affidavit
4. Redacted Version of Draft Safety Evaluation

Enclosure 1

Comments on NRC Draft Safety Evaluation Report for ANP-10348 Revision 0

Framatome Inc. has the following comments on the Draft SE for ANP-10348P, Revision 0:

1. There are four places where there is a typo in the Topical Report number. In all cases ANP-10348 was referenced as ANP-10342:
 - a. Footnote 1 on page - 1 (three instances)
 - b. Footnote 5 on page - 4 (one instance)
2. Throughout the document, Framatome Inc. Proprietary Information has been included. We have marked these places with []. As required by 10 CFR 2.390(b), an affidavit is included as Enclosure 3 to support withholding of information from public disclosure.

Enclosure 3

AFFIDAVIT

1. My name is Philip A. Opsal. I am Manager, Product Licensing for Framatome Inc. (formally known as AREVA 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 Inc. information contained in draft safety evaluation by the office of nuclear reactor regulation for Framatome, Inc. topical report ANP-10348, "Fluence Methodologies For SLR" Project No. 710; docket no. 99902041, Enterprise Project Identification No. I-2020-top-0045, 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(a), 6(b), 6(c), 6(d) and 6(e) above.

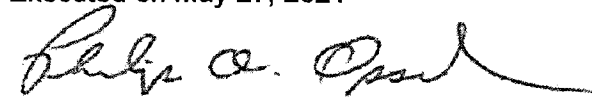
7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited 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 May 27, 2021

A handwritten signature in cursive script, appearing to read "Philip A. Opsal", written over a horizontal line.

Philip A. Opsal