

**framatome**

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July 30, 2021  
NRC:21:026

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

**Submission of ANP-3941P, Revision 0, "GAIA Lead Test Assembly PIE Report"**

Ref. 1: ANP-10342P-A, Revision 0, "GAIA Fuel Assembly Mechanical Design," Framatome Inc.,  
September 2019.

The Safety Evaluation for ANP-10342P-A, Revision 0, "GAIA Fuel Assembly Mechanical Design," (Reference 1), included a limitation and condition (L&C) that the final Lead Test Assembly (LTA) program Post Irradiation Examination (PIE) report be submitted to the NRC prior to any reload batch of GAIA assemblies reaching the third cycle of operation. The enclosure to this letter, ANP-3941P, Revision 0, "GAIA Lead Test Assembly PIE Report," summarizes the PIE results from the GAIA LTAs after completing three (3) cycles of operation at a Westinghouse PWR reactor with a 17x17 fuel rod array.

This report satisfies the L&C as listed in the Safety Evaluation for the approved GAIA Mechanical Topical Report (Reference 1). The first batch of GAIA fuel assemblies was delivered to a U.S. customer in the Spring of 2021; therefore, this report meets the timeline related to the L&C.

This report is submitted for information only and is not being submitted for review. As such, no review fee or Safety Evaluation (SE) is expected.

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 report are provided.

There are no commitments within this letter or its enclosures.

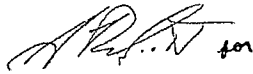
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NRR

Framatome Inc.  
3315 Old Forest Road  
Lynchburg, VA 24501  
Tel: (434) 832-3000

[www.framatome.com](http://www.framatome.com)

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](mailto:Gayle.Elliott@framatome.com).

Sincerely,

A handwritten signature in black ink, appearing to read "G. Peters" with a stylized flourish at the end.

Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

cc: N. Otto  
Project 728

Enclosures:

- 1) Proprietary version of ANP-3941P, Revision 0
- 2) Non-Proprietary version of ANP-3941NP, Revision 0
- 3) Affidavit for withholding of proprietary information

## AFFIDAVIT

1. My name is Gayle Elliott. I am Deputy Director, Licensing and 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 Technical Report ANP-3941P, Revision 0, "GAIA Lead Test Assembly PIE Report," dated July 2021 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 29, 2021

**ELLIOTT Gayle** Digitally signed by ELLIOTT Gayle  
Date: 2021.07.29 15:30:41 -04'00'

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Gayle Elliott