



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 6, 2022

Mr. James Barstow  
Vice President, Nuclear Regulatory  
Affairs and Support Services  
Tennessee Valley Authority  
1101 Market Street, LP 4A-C  
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2 AND 3 – REQUEST FOR  
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE REGARDING  
CONFIRMATORY CALCULATIONS (EPID L-2021-LLA-0132)

Dear Mr. Barstow:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated August 6, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21218A192), Tennessee Valley Authority (TVA) submitted affidavits dated June 14, 2021, executed by Alan B. Meginnis, Manager, Product Licensing, for Framatome, Inc., which requested that the information contained in the following documents be withheld from public disclosure pursuant to section 2.390 of Title 10 of the *Code of Federal Regulations* (10 CFR):

FS1-0056904, Revision 1, "Browns Ferry ATRIUM 11 LAR Flux Map" dated June 2021

FS1-0035159 Revision 7.0, "Framatome U.S. BWR Fuel Assembly Weight Calculation for ATRIUM 11 Family of Fuel Designs," dated March 2021

FS1-0036099, Revision 1, "FLFR Non-Liner Cladding," dated February 2018

FS1 0036100, Revision 1, "LPLFR Non-Liner Cladding," dated February 2018

FS1-0036101, Revision 1, "SPLFR Non-Liner Cladding," dated February 2018

FS1-0014017 Revision 4, "Fuel Channel," dated June 2019

FS1-0014478 Revision 4, "Fuel Channel Weldment," dated September 2020

The affidavits stated that the submitted information should be withheld from public disclosure for the following reason:

The documents contain 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.

Additionally, the affidavits stated that information in the documents 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. Further, the affidavits stated:

6. The following criteria are customarily applied by Framatome to determine whether the 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.

Specifically, Framatome has identified that the proprietary information in above listed documents meets criteria 6(b), 6(d), and 6(e) above.

We have reviewed TVA's application and the material in accordance with the requirements of 10 CFR 2.390 and, based on the statements in the affidavits, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure. In addition, we have determined that the documents contain extensive proprietary information to an extent that a non-proprietary (i.e., redacted) version would be of no value to the public.

Therefore, the version of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-1627.

Sincerely,

*/RA/*

Kimberly J. Green, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-259, 50-260, and 50-296

cc: Alan Meginnis, Manager, Product Licensing  
Framatome, Inc.  
2101 Horn Rapids Rd.  
Richland, WA 99354

cc: Listserv

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**ADAMS Accession No.: ML21347A019**

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DATE	12/13/2021	2/8/2022	12/13/2021
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NAME	DWrona	KGreen	
DATE	6/3/2022	6/6/2022	

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