



May 5, 2023
NRC:23:015

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

Update of Models in ANP-10334P-A, Revision 0

Ref. 1: ANP-10334P-A, Revision 0, "Q12™ Structural Material", September 2017.

Ref. 2: Letter, Gary Peters (Framatome) to Document Control Desk (NRC), "Update of Models in ANP-10334P-A, Revision 0", NRC:21:009, April 2, 2021.

ANP-10334P-A, Revision 0 (Reference 1) contains an update process for the oxidation and hydrogen models for Q12 structural material. In Reference 2, Framatome notified the NRC that updates were made to these models.

This letter is to inform the NRC that Figure 2-1 and Figure 2-2 (enclosed in Reference 2) were corrected by switching their respective x/y axes data, which were incorrectly transposed in Reference 2. Enclosure 1 (proprietary) includes the corrected figures.

Framatome considers some of the material contained in Enclosure 1 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 commitments contained within this letter or its enclosures.

If you have any questions related to this information, please contact Mr. Morris Byram, Licensing Manager. He may be reached by telephone at (434) 221-1082, or by e-mail at Morris.Byram@framatome.com.

Sincerely,



Gayle Elliott, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: N. Otto
Project 728

Enclosures:

1. Proprietary copy of Revised Figures in Framatome Letter NRC:21:009
2. Non-proprietary copy of Revised Figures in Framatome Letter NRC:21:009
3. Affidavit

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

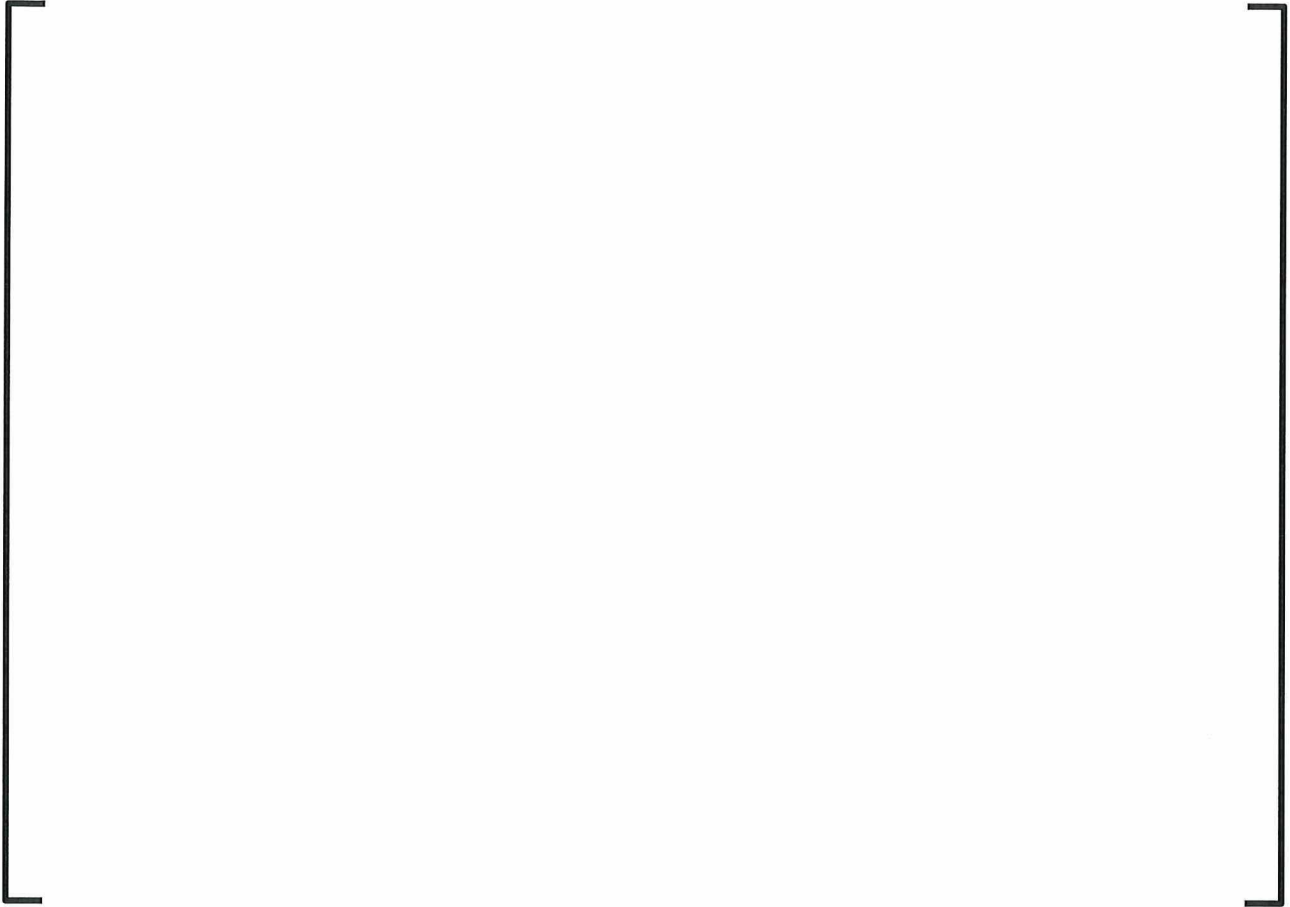
www.framatome.com

Enclosure 2 –
Revised Figures from Framatome Letter NRC:21:009 (Non-proprietary)

Revised Figure 2-1: Figure 8-6: Comparison between Measurement and Prediction for the Oxidation Model for Q12™ Guide Tubes



Revised Figure 2-2: Figure 8-8: Comparison between Measurement and Prediction for the Hydrogen Pickup Model for Q12™ Guide Tubes and Spacer Grids



A F F I D A V I T

1. My name is Morris Byram. I am Licensing Manager, Licensing & 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 Enclosure 1 to Framatome letter NRC:23:015, dated May 5, 2023 and entitled, "Update of Models in ANP-10334P-A, Revision 0," 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(c) 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: (5/8/2023)

BYRAM Morris

Digitally signed by BYRAM
Morris
Date: 2023.05.08 12:45:55
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