



April 12, 2001
NRC:01:016

Document Control Desk
ATTN: Chief, Planning, Program and Management Support Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

**Response to RAI Request Number 6 for Topical Report EMF-2361(P) Revision 0,
EXEM BWR-2000 ECCS Evaluation Model, (TAC NO. MB0574)**

- Ref.: 1. Letter, N. Kalyanam (NRC) to J. F. Mallay (FRA-ANP), "Request for Additional Information - Framatome ANP Richland Inc., Topical Report EMF-2361(P) Revision 0, *EXEM BWR-2000 ECCS Evaluation Model*, (TAC NO. MB0574)," March 5, 2001.
- Ref.: 2. Letter, James F. Mallay (FRA-ANP) to Document Control Desk (NRC), "NRC Review of EMF-2361(P) Revision 0, *EXEM BWR-2000 ECCS Evaluation Model*, NRC:01:012, March 1, 2001.

In response to request number 6 in the letter from the NRC requesting additional information concerning our topical report on EXEM BWR-2000 (see Reference 1), Framatome ANP Richland, Inc. (FRA-ANP) sent a CD containing selected computer codes and detailed instructions for their use (see Reference 2). We determined that the executable form of one of the codes, RELAX, was dynamically linked and therefore relied on the system on which it is installed. Specifically, the compiler options do not statically link the C subroutines that are used in the loading sequence.

FRA-ANP has compiled RELAX in a static form, and this version is contained in the enclosed CD. This newly-compiled version has been tested on our computer hardware, and the results indicate that if this version is run on the NRC's hardware, any differences should be due to hardware only when comparing results to those contained in our topical report on EXEM BWR-2000. We ask that the NRC use this version in making comparisons and conducting sensitivity studies. It is still possible, of course, that minor numerical differences could trip certain switches in the code (associated with Appendix K rules) that would then result in different results.

Framatome ANP Richland, Inc. considers the enclosed CD to be proprietary. As required by 10 CFR 2.790(b), an affidavit is enclosed to support withholding this information from public disclosure.

Framatome ANP Richland, Inc.

2101 Horn Rapids Road
Richland, WA 99352

Tel: (509) 375-8100
Fax: (509) 375-8402

*Rec'd w/out
enclosure
DCD To/0*

Please call Scott Franz (509-375-8678) or me if you have difficulty in applying this version of the computer code.

Very truly yours,

A handwritten signature in black ink, appearing to read "James F. Mallay", with a stylized flourish at the end.

James F. Mallay, Director
Regulatory Affairs

/arn

Enclosure

cc: R. Caruso
N. Kalyanam (w/Enclosure)
R. R. Landry
M. Razzaque
Project No. 702

AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is James F. Mallay. I am Director, Regulatory Affairs, for Framatome ANP Richland, Inc. ("FRA-ANP"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by FRA-ANP to determine whether certain FRA-ANP information is proprietary. I am familiar with the policies established by FRA-ANP to ensure the proper application of these criteria.

3. I am familiar with the FRA-ANP information transmitted with letter NRC:01:016 and referred to herein as "Document." Information contained in this Document has been classified by FRA-ANP as proprietary in accordance with the policies established by FRA-ANP 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 FRA-ANP 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 the Document be withheld from public disclosure.

6. The following criteria are customarily applied by FRA-ANP to determine whether information should be classified as proprietary:

- (a) The information reveals details of FRA-ANP'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 FRA-ANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FRA-ANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FRA-ANP, would be helpful to competitors to FRA-ANP, and would likely cause substantial harm to the competitive position of FRA-ANP.

7. In accordance with FRA-ANP'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 FRA-ANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FRA-ANP 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.

James D. Mallory

SUBSCRIBED before me this 12th
day of April, 2001.

Amy R. Nixon

Amy R. Nixon
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 12/06/03

