

**ATTACHMENT 3**

**AREVA NP Inc. Affidavit**

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA   )  
  ) ss.  
CITY OF LYNCHBURG            )

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1. My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA NP Inc. (AREVA NP) and as such I am authorized to execute this Affidavit.

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

3. I am familiar with the AREVA NP information contained in the Calculation Summary Sheets (CSS) 32-9186204-000, entitled "Quad Cities Unit 2 Reactor Vessel Instrumentation Nozzle Modification Section III Analysis," dated September 2012, 32-9186722-000, entitled "Quad Cities Unit 2 RV Instrument Nozzle J-Groove Weld Residual Stress Analysis," dated October 2012, 32-9193800-000, entitled, "Quad Cities Unit 2 Instrument Nozzle J-Groove Weld Flaw Evaluation using Finite Element," dated December 2012, AREVA NP Report 33-9114561-000, entitled "ASME Design Report Certification Document Contract No. F.501472," dated September 2012, Engineering Information Records 51-9180871-001, entitled, "ASME Section XI Reconciliation for Quad Cities Unit 2 Reactor Vessel Nozzle N-11B Modification," dated December 2012, and 51-9180975-002, entitled, "Corrosion Evaluation of the Quad Cities Unit 2 N11-B Reactor Vessel Nozzle Modification," dated July 2012, and referred to herein as "Documents." Information contained in these Documents has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents 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 AREVA NP to determine whether information should be classified as proprietary:


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

The information in these Documents is considered proprietary for the reasons set forth in paragraphs 6(c) and 6(d) above.

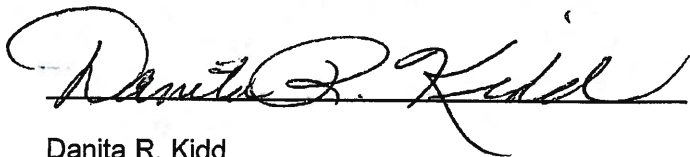
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in these Documents have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP 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.



SUBSCRIBED before me this 14<sup>th</sup>  
day of Jan., 2013.



Danita R. Kidd  
NOTARY PUBLIC, STATE OF VIRGINIA  
MY COMMISSION EXPIRES: 12/31/16  
Reg. # 205569

