



June 5, 2015
NRC:15:027

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

**Response to a Request for Additional Information Regarding ANP-10326P, Revision 1,
"Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless
Steels"**

- Ref. 1: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Response to a Request for Additional Information Regarding ANP-10326P, Revision 0, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'," NRC:13:076, October 14, 2013.
- Ref. 2: Letter, Dennis J. Galvin (NRC) to Pedro Salas (AREVA Inc.), "Request for Additional Information Regarding AREVA NP, Inc. Topical Report ANP-10326P, Revision 1, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels Topical Report'," (TAC No. RG2000)," April 29, 2015.

AREVA Inc. (AREVA) transmitted Revision 1 of the topical report ANP-10326P, "Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels," dated October 2013, in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2.

This letter provides the response to the NRC RAI (Reference 2) in the report ANP-10326Q2P, "Response to Second NRC Request for Additional Information, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels'."

Marked-up revision pages to the topical report, ANP-10326P Revision 1, are also provided and included in the RAI response report enclosed. Pending confirmation that these changes are acceptable, AREVA proposes to revise ANP-10326P, Revision 1 in the approved version of the topical report after issuance of the NRC safety evaluation.

AREVA considers some of the material contained in the enclosed documents 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. Please note that AREVA has determined that a portion of RAI, Question 8 as marked in the enclosure is proprietary in addition to the proprietary marking in Reference 2.

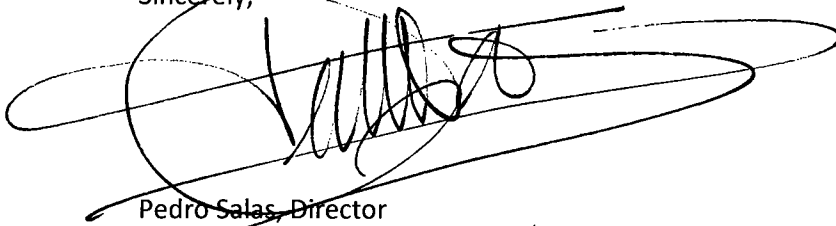
AREVA INC.

3315 Old Forest Road, Lynchburg, VA 24501
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If you have any questions related to this letter, please contact Mr. Morris E. Byram, Product Licensing Manager at 434-832-4665, or by e-mail at Morris.Byram@areva.com.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Pedro Salas', is written over a large, loopy circular flourish.

Pedro Salas, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: D. Carlson
Project 728

Enclosures:

1. Proprietary Version of ANP-10326Q2P, "Response to Second NRC Request for Additional Information, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels',"
2. Non-Proprietary Version of ANP-10326Q2NP, "Response to Second NRC Request for Additional Information, 'Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels',"
3. Notarized Affidavit

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Morris Byram. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.
2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.
3. I am familiar with the AREVA information contained in the topical report ANP-10326Q2P, "Response to Second NRC Request for Additional Information, ANP-10326P, Revision 1, Environmentally Assisted Fatigue: Modified Effective Correction Factor for Austenitic Stainless Steels," dated May, 2015, and referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. 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 AREVA 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 AREVA to determine whether information should be classified as proprietary:

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

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

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

8. AREVA 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.

Marie E. Bynah

SUBSCRIBED before me this 4th
day of June, 2015.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

