



**FPL**

June 18, 2015

L-2015-177  
10 CFR 50.90

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

RE: St. Lucie Unit 2  
Docket No. 50-389  
Resubmittal of the AREVA Small Break LOCA Summary Report Within the Application for Technical Specification Change and Exemption Request Regarding the Transitioning to AREVA Fuel

Reference:

1. FPL letter L-2014-366 dated December 30, 2014, "Application for Technical Specification Change and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15002A091
2. FPL letter L-2015-091 dated March 23, 2015, "Supplemental Information for Technical Specification Change and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15084A011
3. NRC letter dated May 12, 2015, "St. Lucie Plant, Unit No. 2 - Request for Additional Information Regarding License Amendment Request and Exemption Request Regarding the Transitioning to AREVA Fuel (TAC NOS. MF5494 AND MF5495)," Accession No. ML15127A405
4. FPL Letter L-2015-166 dated June 2, 2015, "RAI Reply for Application for Technical Specification Change and Exemption Request Regarding the Transitioning to AREVA Fuel."

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) submitted via Reference 1 and supplemented via Reference 2 a license amendment to the Technical Specifications (TS) for St. Lucie Unit 2 to allow the use of AREVA fuel. Reference 4 provided the response to the NRC request for additional information (RAI) of Reference 3.

Subsequently, it was discovered that the proprietary markings documented within Attachment 5, "AREVA proprietary report ANP-3345P, Revision 0, St. Lucie Unit 2 Fuel Transition Small Break LOCA Summary Report" of Reference 1 were incorrect. Attachment 1 of this letter provides the affidavit for withholding the corrected proprietary report from the public, Attachment 2 provides the corrected proprietary report, and Attachment 3 provides the non-proprietary version of the report.

A002  
NRR

If you should have any questions, please contact Mr. Ken Frehafer at (772) 467-7748.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17, 2015.

Sincerely,



Christopher R. Costanzo

Site Vice President

St. Lucie Plant

CRC/KWF

Attachments

1. AREVA affidavit for withholding proprietary information from the public
2. AREVA proprietary report ANP-3345P, Revision 1, St. Lucie Unit 2 Fuel Transition Small Break LOCA Summary Report
3. AREVA non-proprietary report ANP-3345NP, Revision 1, St. Lucie Unit 2 Fuel Transition Small Break LOCA Summary Report

cc: USNRC Regional Administrator, Region II  
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant  
Ms. Cindy Becker, Florida Department of Health

AFFIDAVIT

COMMONWEALTH OF VIRGINIA    )  
  ) ss.  
CITY OF LYNCHBURG            )

1. My name is Gayle Elliott. 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 ANP-3345P, Revision 1, entitled, "St. Lucie Unit 2 Fuel Transition Small Break LOCA Summary Report," dated June 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:

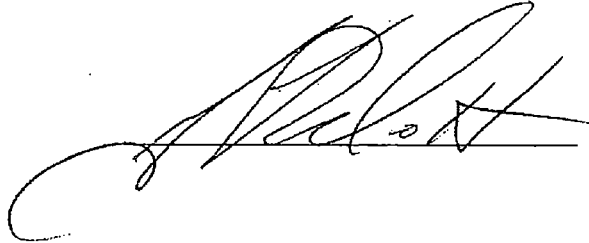
- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (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) through 6(e) 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.



SUBSCRIBED before me this 4<sup>th</sup>  
day of June, 2015.



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

