



April 29, 2016  
NRC:16:012

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

**Request for Review and Approval of BAW-10247P-A Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods"**

AREVA Inc. (AREVA) requests the NRC's review and approval of the topical report BAW-10247P-A Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods," dated April 2016, for referencing in licensing actions.

This topical report contains updated rod bow and growth correlations supporting the fuel mechanical analyses. These correlations include data necessary to implement the use of chromia-doped fuel into AREVA's suite of BWR licensing methods. Many of the topical reports that make up AREVA's suite of BWR methods are currently being reviewed for approval by the NRC. Topical report BAW-10247P-A Supplement 2P, Revision 0 is an integral part of the BWR suite of methods. The use of chromia-doped fuel has the goal of enhancing safe operation at BWR plants by reducing PCI failures.

In support of the Office of Nuclear Reactor Regulation's prioritization efforts, the Topical Report Prioritization Scheme is included as an enclosure with this letter.

AREVA would appreciate the NRC approval of this topical report by the end of the fourth quarter of calendar year 2017.

AREVA considers some of the material contained in the enclosed document 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. A proprietary version and a non-proprietary version of the report are enclosed.

There are no commitments within this letter or its enclosures.

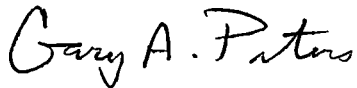
**AREVA INC.**

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Tel.: 434 832 3000 - [www.areva.com](http://www.areva.com)

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If you have any questions related to this information, please contact Mr. Alan B. Meginnis by telephone at (509) 375-8266, or by e-mail at [Alan.Meginnis@areva.com](mailto:Alan.Meginnis@areva.com).

Sincerely,



Gary A. Peters, Director  
Licensing & Regulatory Affairs  
AREVA Inc.

cc: J. G. Rowley  
Project 728

Enclosures:

1. Proprietary copy of topical report BAW-10247P-A Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology For Boiling Water Reactors Supplement 2: Mechanical Methods"
2. Non-Proprietary copy of topical report BAW-10247NP-A Supplement 2NP, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology For Boiling Water Reactors Supplement 2: Mechanical Methods"
3. BAW-10247P-A Supplement 2P, Revision 0 Priority Form
4. Notarized Affidavit

## AFFIDAVIT

STATE OF WASHINGTON    )  
                                  ) ss.  
COUNTY OF BENTON     )

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for AREVA Inc. 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 report BAW-10247P-A Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods," dated April 2016 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 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 the Document is considered proprietary for the reasons set forth in paragraphs 6(a), 6(b), 6(c), 6(d) and 6(e) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document have 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.

*Alan B. McCoy*

SUBSCRIBED before me this 28<sup>th</sup>  
day of April, 2016.

*Susan K McCoy*

Susan K. McCoy  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 1/14/2020

SUSAN K MCCOY  
NOTARY PUBLIC - WASHINGTON  
MY COMMISSION EXPIRES 01-14-2020