



May 4, 2016
MJW:16:027

U.S. Nuclear Regulatory Commission
Director, Office of Nuclear Material
Safety and Safeguards
Attn: Document Control Desk
Washington, DC 20555-0001

Dear Sirs:

Subject: Revised Fundamental Nuclear Material Control Plan for AREVA Inc. (Lic. No. SNM-1227; Docket No. 70-1257)

Enclosed are six copies of the Richland Fundamental Nuclear Material Control Plan E07-01-001 Revision 6.

The information in the FNMCP is proprietary in accordance with 10 CFR 2.390(d). An affidavit supporting the proprietary nature of this information is attached.

AREVA has made a large number of changes to the FNMCP. Most changes are editorial clarifications. We do not believe that the revised plan is less effective than our current plan. However, to be conservative and to allow for more open dialogue, we are submitting the revised plan as a 70.34 amendment to the Richland license. AREVA will not implement the revised plan until we receive NRC approval.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Michael Wilbricht'.

Michael Wilbricht
Safeguards Staff Specialist

C: Leira Cuarado (NRC)
Tom Pham (NRC)

AREVA INC.

2101 Horn Rapids Road, Richland WA 99354
Tel.: 509 375 8100 - www.areva.com

NMSS20

AFFIDAVIT

STATE OF WASHINGTON)
 :
COUNTY OF BENTON) ss

Michael Wilbricht, being duly sworn on oath, states as follows:

1. I am employed by AREVA Inc. (AREVA) as the Safeguards Staff Specialist in Richland, Washington. I am responsible for the overall administration of the nuclear material control and accounting at AREVA's Richland, Washington nuclear fuel fabrication facility. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as the Safeguards Staff Specialist. This affidavit is submitted in accordance with the provisions of 10 CFR § 2.390.
2. I am familiar with the contents of the "Fundamental Nuclear Material Control Plan", E07-01-001, which provides nuclear material control information for the AREVA Inc., Richland, Washington Fuel Fabrication Facility as required by 10 CFR § 74.31. This plan is designated as "Proprietary" by AREVA in accordance with the document control system and policies established by AREVA for the control and protection of proprietary and confidential information.
3. AREVA is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors and delivering SNM to other nuclear fuel fabricators in foreign countries for inclusion in nuclear fuel assemblies. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as AREVA. Competition among these companies including AREVA is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The "Fundamental Nuclear Material Control Plan" contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in this report is commercial and confidential because it reveals specific information about the AREVA Richland manufacturing facility relative to its production throughput. All of this information can be used by competitors to gain undue insight into AREVA's commercial relationships, probable cost structure, operations and business.

5. AREVA will suffer considerable competitive harm if the content of the "Fundamental Nuclear Material Control Plan" is made available to AREVA's domestic and international competitors because of the potential to undermine the financial position of AREVA. Finally, this information cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 4th day of May, 2016

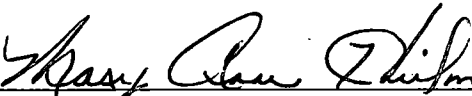


Michael Wilbricht
Safeguards Staff Specialist

STATE OF WASHINGTON)
 : SS
COUNTY OF BENTON)

On this 4th day of May, 2016, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Michael Wilbricht to me known to be the Safeguards Staff Specialist of AREVA Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.


Mary Anne Heilman
Notary Public in and for the State of Washington
residing at Kennewick, Washington.
MY COMMISSION EXPIRES: 6/6/2016

