



October 25, 2016
MJW:16:050

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

Subject: Response to NRC RAI for AREVA Inc. FNMCP (Lic. No. SNM-1227; Docket No. 70-1257)

Attached is the AREVA response to the NRC Request for Additional Information (RAI) received by AREVA on September 29, 2016. The RAI is related to the AREVA Fundamental Nuclear Material Control Plan (FNMCP) Version 6 submitted to the NRC for 70.34 amendment approval on May 6, 2016 and recorded as Docket No. 70-1257.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read 'm. wilbricht'.

Michael Wilbricht
Safeguards Staff Specialist

NMSS 20

AREVA INC.

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

AFFIDAVIT

STATE OF WASHINGTON)
 : ss
COUNTY OF BENTON)

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. I am familiar with the contents of the AREVA Response to the NRC Request for Additional Information (RAI) on the Fundamental Nuclear Material Control Plan submitted for NRC approval on May 6, 2016. The "RAI response" is also designated as "Proprietary" by AREVA.
4. 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.

5. The "Fundamental Nuclear Material Control Plan" and "RAI Response" contain commercial information of a confidential nature that is not available in public sources or available to the public. This information 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.

6. AREVA will suffer considerable competitive harm if the content of the "Fundamental Nuclear Material Control Plan" or "RAI Response" are 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 25th day of October, 2016

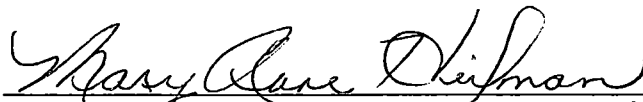


Michael Wilbricht
Safeguards Staff Specialist

STATE OF WASHINGTON)
 : ss
COUNTY OF BENTON)

On this 25th day of October, 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: 6/6/2020

