



October 27, 2016

Serial: BSEP 16-0098

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

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2  
Renewed Facility Operating License Nos. DPR-71 and DPR-62  
Docket Nos. 50-325 and 50-324  
Information Transmittal for NRC Model Development

- References:
1. Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Request for License Amendment Regarding Core Flow Operating Range Expansion*, dated September 6, 2016, ADAMS Accession Number ML16257A418.
  2. NRC E-mail Capture, *Regulatory Audit Plan for Brunswick Steam Electric Plant Unit Nos. 1 and 2 to Support Review of the License Amendment Request Regarding Core Flow Operating Range Expansion Maximum Extended Load Line Limit Analysis Plus*, Docket Nos. 50-325 and 50-324, dated October 19, 2016, ADAMS Accession Number ML16294A273.

Ladies and Gentlemen:

By letter dated September 6, 2016 (i.e., Reference 1), Duke Energy Progress, LLC (Duke Energy) submitted a license amendment request (LAR) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, to support an expansion of the core power-flow operating range (i.e., Maximum Extended Load Line Limit Analysis Plus (MELLLA+)). Subsequently, the NRC initiated an audit (i.e., Reference 2) to support their review of the LAR by conducting confirmatory calculations using the TRACE computer code.

Prior to issuance of the NRC audit plan, a telephone call was held on September 20, 2016, to discuss the feasibility of Duke Energy providing certain BSEP core-modelling information to support NRC development of a TRACE computer model. The NRC stated that development of this computer model was not required for the BSEP MELLLA+ license amendment request review, and as a result, would be separate from and not be billable as a MELLLA+ license amendment request review activity. During the call, Duke Energy identified two items that could be used to support the NRC's model development efforts. The first item is AREVA NP (AREVA) Document Number 51-9173927-000, *ATRIUM™ 10XM Data for Brunswick MELLLA+ LAR Support*. The second item is a copy of the General Electric Hitachi (GEH) TRAC-G computer code base deck that supports the BSEP MELLLA+ license amendment request, and the associated TRAC-G user's guide. GEH and AREVA have agreed to provide to the NRC the information referenced above in support of the NRC audit.

ADD  
NRR

A copy of AREVA Document Number 51-9173927-000, *ATRIUM™ 10XM Data for Brunswick MELLLA+ LAR Support*, is provided in Enclosure 1. AREVA Document Number 51-9173927-000 is provided for information only and is considered by AREVA to be a proprietary document, in its entirety. AREVA has indicated that any use of this information outside the context of a licensing review for BSEP is not permitted. Enclosure 2 provides an affidavit by AREVA supporting the withholding from public disclosure of AREVA Document Number 51-9173927-000.

Duke Energy plans to provide the General Electric Hitachi (GEH) TRAC-G computer code base deck and associated user's guide under a separate letter.

No regulatory commitments are contained in this letter.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager – Regulatory Affairs, at (910) 457-2487.

Sincerely, 

Annette H. Pope  
Director – Organizational Effectiveness  
Brunswick Steam Electric Plant

WRM/wrm

Enclosures:

1. AREVA Document Number 51-9173927-000, *ATRIUM™ 10XM Data for Brunswick MELLLA+ LAR Support* (**Proprietary Information – Withhold from Public Disclosure in Accordance With 10 CFR 2.390**)
2. AREVA NP Affidavit Regarding Withholding AREVA Document Number 51-9173927-000, *ATRIUM™ 10XM Data for Brunswick MELLLA+ LAR Support*

cc (with Enclosures 1 and 2):

U.S. Nuclear Regulatory Commission  
ATTN: Mr. Andrew Hon (Mail Stop OWFN 8G9A) **(Electronic Copy Only)**  
11555 Rockville Pike  
Rockville, MD 20852-2738  
Andrew.Hon@nrc.gov

cc (without Enclosures 1 and 2):

U.S. Nuclear Regulatory Commission, Region II  
ATTN: Ms. Catherine Haney, Regional Administrator  
245 Peachtree Center Ave, NE, Suite 1200  
Atlanta, GA 30303-1257

U.S. Nuclear Regulatory Commission  
ATTN: Ms. Michelle P. Catts, NRC Senior Resident Inspector  
8470 River Road  
Southport, NC 28461-8869

Chair - North Carolina Utilities Commission **(Electronic Copy Only)**  
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AREVA NP Affidavit Regarding  
Withholding AREVA Document Number 51-9173927-000,  
*ATRIUM™ 10XM Data for Brunswick MELLLA+ LAR Support*

## 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 51-9173927-000, "ATRIUM™ 10XM Data for Brunswick MELLLA+ LAR Support," dated December 2011 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(b), 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.

Al B McCoy

SUBSCRIBED before me this 30th  
day of September, 2016.

Susan K McCoy

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

