



January 24, 2017

NRC:17:005

7R050728

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

**Response to Request for Additional Information Regarding BAW-10192PA-00, Supplement 1, Revision 0 "BWNT LOCA – BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants"**

- Ref. 1: Letter Gayle F. Elliott (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of BAW-10192PA-00, Supplement 1, Revision 0 'BWNT LOCA – BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants'," NRC:15:047, November 25, 2015.
- Ref. 2: Letter, Jonathan G. Rowley (NRC) to Gary Peters (AREVA Inc.), "Request for Additional Information Re: AREVA Inc. Topical Report BAW-10192PA-00, Supplement 1, Revision 0, 'BWNT LOCA – BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants' (CAC No. MF7145)", September 22, 2016.

AREVA Inc. (AREVA) requested the NRC's review and approval of the topical report BAW-10192PA-00, Supplement 1, Revision 0, "BWNT LOCA – BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants" in Reference 1. The NRC provided a Request for Additional Information (RAI) in Reference 2. The response to this RAI is enclosed with this letter.

AREVA considers some of the information contained in the enclosed documents 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. Proprietary and non-proprietary versions of the RAI responses are enclosed.

There are no commitments within this letter or its enclosures.

If you have any questions related to this information, please contact Ms. Gayle F. Elliott, Product Licensing Manager, by telephone at (434) 832-3347, or by e-mail at [Gayle.Elliott@areva.com](mailto:Gayle.Elliott@areva.com).

Sincerely,

A handwritten signature in cursive script that reads "Gary Peters".

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

T007  
YGD1  
NRR

**AREVA INC.**

cc: J. G. Rowley  
Project 728

Enclosures:

- 1 Proprietary version of BAW-10192PA, Rev. 0, Supplement 1P, Rev. 0, Q1P, Revision 0, 'Response to Request for Additional Information – BAW-10192PA, Revision 0, Supplement 1P, Revision 0'."
- 2 Non-proprietary version of BAW-10192PA, Rev. 0, Supplement 1P, Rev. 0, Q1P, Revision 0, 'Response to Request for Additional Information – BAW-10192PA, Revision 0, Supplement 1P, Revision 0'."
- 3 Notarized Affidavit

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA    )  
  ) ss.  
CITY OF LYNCHBURG            )

1. My name is Tom Ryan. 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 the following document: "BAW-10192PA, Rev. 0, Supplement 1P, Rev. 0, Q1P, Revision 0, 'Response to Request for Additional Information – BAW-10192PA, Revision 0, Supplement 1P, Revision 0'," 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) and 6(d) 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.

Tan Ryan

SUBSCRIBED before me this 19th  
day of January, 2017.

Sherry L. McFaden

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

