



December 8, 2017
NRC:17:054

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

Publication of BAW-10179P-A, Revision 9, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses"

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (AREVA Inc.), "Revised Final Safety Evaluation for AREVA Inc. Topical Report BAW-10179P, Revision 9, 'Safety Criteria and Methodology for Acceptable Cycle Reload Analyses' (CAC No. MF8167)," November 21, 2017.

In Reference 1 the U.S. Nuclear Regulatory Commission (NRC) accepted the topical report BAW-10179P, Revision 9, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses" for referencing in license applications. The NRC requested that AREVA Inc. (AREVA) publish proprietary and non-proprietary versions of the approved report within three months.

One proprietary version and one non-proprietary version of the report are provided with this letter. The published report is constructed in accordance with guidance provided on the NRC website.


In creating the approved version of the topical report AREVA corrected a number of typographical errors in the report. Table 1 lists the typographical errors that were corrected.

AREVA considers some of the material contained in the enclosed documents to be proprietary. As required by 10 CFR 2.380(b), an affidavit is enclosed to support the withholding of proprietary information from public disclosure.

There are no commitments contained within this letter or its enclosures.

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

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

4601
NRR

AREVA INC.

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**Table 1: List of Corrections to Typographical Errors in the
Approved Version of the Topical Report**

Page	Location	Correction
xiv	Last bullet item on page	"Reference 84" changed to "reference 84"
1-3	Last bullet item on page	"Reference 84" changed to "reference 84"
4-16	Second paragraph on page	"Reference 84" changed to "reference 84"
5-28	First sentence on page	"Reference 84" changed to "reference 84"
6-30	Second to last paragraph on page	"Reference 84" changed to "reference 84"
7-14	Sixth line from the bottom of the page	"Sew" changed to "S _{ew} "

Enclosures:

- 1) Topical Report BAW-10179P-A, Revision 9, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses" (Proprietary)
- 2) Topical Report BAW-10179NP-A, Revision 9, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses" (Non-Proprietary)
- 3) Notarized Affidavit

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Nathan E. Hottle. 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-10179P-A Revision 9, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses," 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(a), 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.

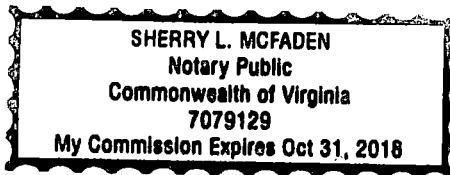
9. The foregoing statements are true and correct to the best of my knowledge,
information, and belief.

Nathan E. Kelly

SUBSCRIBED before me this 30th
day of November, 2017.

Sherry L. McFaden

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



bcc: NRC:17:054
T Point: T4.12.2

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