



December 15, 2017
NRC:17:055

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

Request for Review and Approval of ANP-10346P, Revision 0, "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA"

AREVA Inc. (AREVA) requests NRC review and approval of Topical Report ANP-10346P, Revision 0, "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA" for referencing in licensing actions. This Topical Report describes a method for performing Anticipated Transient Without Scram with Instability (ATWS-I) analyses for Boiling Water Reactors (BWR).


AREVA considers some of the material contained in the enclosed document 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 report are enclosed.

In support of the Office of Nuclear Reactor Regulation's prioritization efforts, the prioritization scheme matrix is included in Enclosure A.

There are no commitments within this letter or its enclosures.

If you have any questions related to this information, please contact Mr. Alan Meginnis by telephone at (509) 375-8266, or by e-mail at alan.meginnis@areva.com

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
AREVA Inc.

cc: J. G. Rowley
Project 728

YGOI
NRR

AREVA INC.

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Enclosures:

- A. NRC Prioritization Matrix
- B. A proprietary copy of topical report ANP-10346, Revision 0
- C. A non-proprietary copy of topical report ANP-10346, Revision 0
- D. Notarized Affidavit

Enclosure A:
NRC Prioritization Matrix

TR Prioritization Scheme Matrix for Metric and Resources			
Title: ANP-10346P, Revision 0, "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA"			
Expect submitting FY	TAC	PM	Today's Date: 12/15/2017
Technical Review Division(s)		Technical Review Branch(s)	
Factors	Select the Criteria That the TR Satisfies	Points can be Assigned for Each Criteria	Assigned Points
TR Classification (Select one only)	Resolve Generic Safety Issue (GSI).	6	2
	Emergent NRC Technical Issue.	3	
	New technology improves safety.	2	
	TR Revision reflecting current requirements or analytical methods.	2	
	Standard TR.	1	
TR Applicability (Select one only)	Potential industry-wide applications.	3	2
	Potentially applicable to entire groups of licensees.	2	
	Intended for only partial groups of licensees.	1	
TR Implementation Certainty (Select one only)	Industry-wide Implementation expected.	3	1
	Expected implementation by an entire group of licensees (BWROG, PWROG, BWRVIP, etc.) who sponsored the TR.	2	
	Docketed intent by U.S. plant(s) but no formal LAR schedule yet.	1	
	No U.S. plant(s) have indicated strong intent on docket to implement yet.	0	
Tie to a LAR (Select if applicable)	A SE is requested by a certain date (less than two years) to support a licensing activity or renewal date (note it in Comments).	3	0
Review Progress (Points are cumulative as applicable)	Accepted for review.	0.3	0
	RAI issued.	0.5	0
	RAI responded.	1.2	0
	SE drafted.	2.0	0
Management (LT/ET) discretion adjustment		-3 to +3	
Total Points (Add the total points from each factor and total here):			5
Comments: The need for this method is a result of NRC requirement for ATWS-I analyses for plants that operate in the MELLLA+ or Extended Flow Window.			

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 of ANP-10346P, Revision 0, "ATWS-I Analysis Methodology for BWRs Using RAMONA5-FA" dated December 2017 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(c), 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.

Ala B Meg

SUBSCRIBED before me this 13th
day of December, 2017.

Hailey M. Siekawitch

Hailey M Siekawitch
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 9/28/2020

