

**framatome**

PRD 0728

January 26, 2018  
NRC:18:002

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

**Revision to a Response to Request for Information Regarding AREVA Inc. Topical Report ANP-10335P, Revision 0, "ACE/ATRIUM 11 Critical Power Correlation"**

- Ref. 1: Letter, Pedro Salas (AREVA) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10335P Revision 0, 'ACE/ATRIUM 11 Critical Power Correlation'," NRC:15:012, February 27, 2015.
- Ref. 2: Letter, Gary Peters (AREVA) to Jonathan Rowley (NRC), "Response to a Request for Additional Information Regarding Topical Report ANP-10335P, Revision 0, 'ACE/ATRIUM 11 Critical Power Correlation'," NRC:16:020, August 11, 2016.

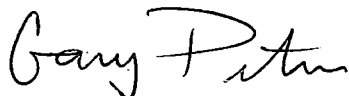
Framatome Inc. (Framatome, formerly AREVA Inc.) requested the NRC review and approval of Topical Report (TR) ANP-10335P, Revision 0, "ACE/ATRIUM 11 Critical Power Correlation" in Reference 1. The NRC provided a request for additional information (RAI), and Framatome responded to the RAI in Reference 2. As discussed via telephone, Framatome is providing a revision to that response, enclosed with this letter. Please note that only the response to question 14 of the RAI response was revised. For convenience, the complete RAI response with revision is enclosed. Revision 1 of ANP-10335Q1P will be the only version of the RAI response document which will be included in the final PA version of the Topical Report.

Framatome considers some of the material contained in the enclosed to be proprietary. As required by 10 CFR 2.390(b), an affidavit is attached to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the attached RAI responses are provided.

There are no commitments within this letter or its enclosures.

If you have any questions related to this information, please contact Mr. Morris E. Byram by telephone at (509) 375-8166, or by e-mail at [Morris.Byram@areva.com](mailto:Morris.Byram@areva.com).

Sincerely,



Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome, Inc.

YGD1  
NRK

cc: J. G. Rowley  
Project 728

Enclosures:

1. Proprietary copy of ANP-10335Q1P, Revision 1, "ACE/ATRIUM 11 Critical Power Correlation - RAIs"
2. Non-Proprietary copy of ANP-10335Q1NP, Revision 1, "ACE/ATRIUM 11 Critical Power Correlation - RAIs"
3. Notarized Affidavit

## AFFIDAVIT

STATE OF WASHINGTON       )  
                                  ) ss.  
COUNTY OF BENTON       )

1.       My name is Morris Byram. I am Manager, Product Licensing, for Framatome Inc. (Framatome) and as such I am authorized to execute this Affidavit.

2.       I am familiar with the criteria applied by Framatome to determine whether certain Framatome information is proprietary. I am familiar with the policies established by Framatome to ensure the proper application of these criteria.

3.       I am familiar with the Framatome information contained in the report ANP-10335Q1P, Revision 1, entitled "ACE/ATRIUM 11 Critical Power Correlation - RAIs" referred to herein as "Document." Information contained in this document has been classified by Framatome as proprietary in accordance with the policies established by Framatome 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 Framatome 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 Framatome to determine whether information should be classified as proprietary:

- (a) The information reveals details of Framatome'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 Framatome.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Framatome.

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 Framatome'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 Framatome only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Framatome 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.

Thomas E. Byrnes

SUBSCRIBED before me this 25  
day of January, 2018.

Susan K McCoy

