

March 9, 2018
NRC:18:010

PROD728

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

Additional Information Regarding Topical Report ANP-10297PA, Supplement 1, "The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results"

- Ref. 1: Letter, Pedro Salas (AREVA) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10297P-A, Revision 0, Supplement 1, 'The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results Topical Report'," NRC:15:031, June 26, 2015.
- Ref. 2: Letter, Jonathan Rowley (NRC) to Gary Peters (AREVA), "Request for Additional Information RE: AREVA Inc. Topical Report ANP-10297P(A), Revision 0, Supplement 1, 'The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results' (CAC NO. MF6469)," April 18, 2017.
- Ref. 3: Letter, Gary Peters (Framatome Inc.) to Document Control Desk (NRC), "Response to Request for Additional Information Regarding Topical Report ANP-10297PA, Supplement 1, 'The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results'," NRC:17:023, May 30, 2017.

Framatome Inc. (Framatome, formerly AREVA Inc.) requested the NRC's review and approval of ANP-10297PA Supplement 1, "The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results" in Reference 1. The NRC requested additional information regarding this topical report in Reference 2. Framatome's response to the request for additional information was provided in Reference 3. After responding to question 7 of Reference 3, Framatome noted that additional information regarding cross section adjustments discussed in Reference 1 would be beneficial for the NRC in reviewing Supplement 1 of the ARCADIA® Topical Report. This additional information is provided as an enclosure to this letter.

Framatome considers some of the material contained in the enclosure 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 Framatome's additional information are provided.

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

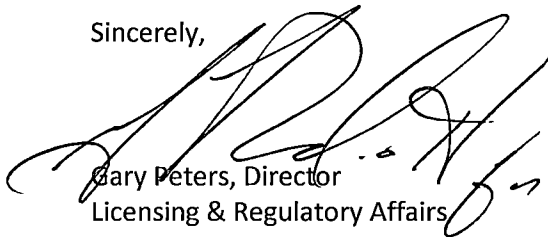
Framatome Inc.
3315 Old Forest Road
Lynchburg, VA 24501
Tel: (434) 832-3000

www.framatome.com

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If you have any questions related to this information, please contact Mr. Nathan Hottle by telephone at (434) 832-3864, or by e-mail at Nathan.Hottle@framatome.com.

Sincerely,



Gary Peters, Director
Licensing & Regulatory Affairs
Framatome Inc.

cc: J. G. Rowley
Project 728

Enclosures:

1. Proprietary Version of ANP-10297, Revision 0, Supplement 1, Revision 0, Q2P, Revision 0, "Additional Information - ANP-10297PA, Supplement 1, 'The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results' "
2. Non-Proprietary Version of ANP-10297, Revision 0, Supplement 1, Revision 0, Q2P, Revision 0, "Additional Information - ANP-10297PA, Supplement 1, 'The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results' "
3. Notarized Affidavit for Withholding of Proprietary Information

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle Elliott. I am Deputy Director, Licensing & Regulatory Affairs, 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 topical report ANP-10297, Revision 0, Supplement 1, Revision 0, Q2P, Revision 0, entitled, "Additional Information – ANP-10297PA Supplement 1, 'The ARCADIA® Reactor Analysis System for PWRs Methodology Description and Benchmarking Results'," dated March 2018 and 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(d) and 6(e) above.

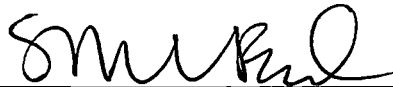
7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited 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.

A large, stylized handwritten signature in black ink, written over a horizontal line.

SUBSCRIBED before me this 9th
day of March, 2018.

A handwritten signature in black ink, written over a horizontal line.

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

