



PROJ 0728

March 28, 2018
NRC:18:011

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

Additional Information Regarding ANP-10340P, "Incorporation of Chromia-Doped Fuel Properties in AREVA Approved Methods"

- Ref. 1: Letter Gary A. Peters (AREVA Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10340P, Revision 0, 'Incorporation of Chromia-Doped Fuel Properties in AREVA Approved Methods'," NRC:16:010, April 29, 2016.
- Ref. 2: Letter, Letter Gary Peters (AREVA Inc.) to Document Control Desk (NRC), "Response to Request for Additional Information Regarding ANP-10340P, 'Incorporation of Chromia-Doped Fuel Properties in AREVA Approved Methods'," NRC:17:045, October 27, 2017.

Framatome Inc. (Framatome, formally AREVA Inc.) requested the NRC's review and approval of the topical report ANP-10340P, "Incorporation of Chromia-Doped Fuel Properties in AREVA Approved Methods" in Reference 1. A response to a Request for Additional Information (RAI) was provided in Reference 2.

The NRC provided an additional comment on ANP-10340P in an email on March 6, 2018. A response to the additional comment is provided in Revision 1 of the Response to Request for Additional Information.

Framatome 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.

YGD1
NRR

If you have any questions related to this submittal please contact Ms. Gayle F. Elliott, (Product Licensing Manager). She may be reached by telephone at 434-832-3347 or by e-mail at Gayle.Elliott@framatome.com

Sincerely,



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

cc: J. G. Rowley
Project 728

Enclosures:

1. ANP-10340Q1P, Revision 1, Response to Request for Additional Information-ANP-10340
2. ANP-10340Q1NP, Revision 1, Response to Request for Additional Information-ANP-10340
3. Notarized Affidavit

AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for Framatome Inc. 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-10340Q1P, Revision 1, "Response to Request for Additional Information- ANP-10340 Incorporation of Chromia-Doped Fuel Properties in AREVA Approved Methods," 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 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 Framatome'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 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.

Alan & Meg

SUBSCRIBED before me this 26th
day of March, 2018.

Hailey M. Siekawitch

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

