

framatome

June 29, 2018
NRC:18:026

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

PROJ 0728

**Request for Resumption of Review of ANP-10323P using ANP-10323P Revision 1,
"GALILEO Fuel Rod Thermal-Mechanical Methodology for Pressurized Water Reactors"**

- Ref. 1: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10323P, 'Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors'," NRC:13:063, August 1, 2013.
- Ref. 2: Letter, Gayle Elliott (AREVA Inc.) to Document Control Desk (NRC), "Revised Request for Review and Approval of ANP-10323P, 'Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors'," NRC:15:045, November 23, 2015.

In Reference 1, Framatome Inc. (formerly AREVA NP Inc.) requested NRC review and approval of ANP-10323P Revision 0, "Fuel Rod Thermal Mechanical Methodology for Boiling Water Reactors and Pressurized Water Reactors." Framatome subsequently requested that the NRC review be suspended until certain issues could be resolved. The enclosed Revision 1 to ANP-10323P incorporates the following:

- 1) changes resulting from resolution of these issues,
- 2) the revised application range described in Reference 2, and
- 3) additional changes to the methodology discussed in the April 24, 2018 pre-submittal meeting.

Framatome requests that the NRC resume the review of ANP-10323P using Revision 1. Framatome plans to provide separately a manual to assist the reviewer in understanding the changes from Revision 0 to Revision 1. Outstanding requests for additional information on Revision 0 will be addressed as discussed at the pre-submittal meeting.

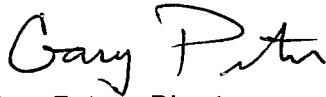
Framatome considers some of the material contained in Enclosure 1 to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support withholding of information from public disclosure.

YGO1
NRR

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

If you have any questions related to this information, please contact Mr. Nathan Hottle, Product Licensing Manager, 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 ANP-10323P Revision 1 (PROPRIETARY)
- 2 ANP-10323NP Revision 1 (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 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 following document: ANP-10323P Revision 1, "Fuel Rod Thermal Mechanical Methodology for Pressurized Water Reactors," 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 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 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(a), 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.

Matthew E. Hough

SUBSCRIBED before me this 27th
day of June, 2018.

Sherry L. McFaden

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

