

# framatome

August 31, 2018  
NRC:18:034

PRD10728  
99902041

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

**Publication of BAW-10247P-A Supplement 2P-A, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods"**

Ref. 1: Letter, Dennis C. Morey (NRC) to Gary Peters (Framatome Inc.), "Final Safety Evaluation for Topical Report BAW-10247P-A, Supplement 2P, Revision 0, 'Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors, Supplement 2: Mechanical Methods' (CAC No. MF7708; EPID L-2016-TOP-0005)," August 15, 2018.

In Reference 1 the NRC accepted the topical report BAW-10247P-A Supplement 2P, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods" for referencing in license applications and requested that Framatome Inc. (Framatome, formerly AREVA Inc.) publish the report as an "A" version within three months. One proprietary version and one non-proprietary version are provided with this letter.

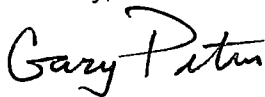
The published report is constructed in accordance with guidance provided on the NRC website.

Framatome considers some of the material contained in the enclosed documents to be proprietary. As required by 10 CFR 2.380(b), an affidavit is enclosed to support the withholding of information from public disclosure.

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

If you have any questions related to this information, please contact Ms. Gayle Elliott, Deputy Director, Licensing & Regulatory Affairs, by telephone at (434) 832-3347, or by e-mail at [Gayle.Elliott@framatome.com](mailto:Gayle.Elliott@framatome.com).

Sincerely,



Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

cc: J. G. Rowley  
Project 728

Y GDI  
NRK

Enclosures

1. Proprietary copy of BAW-10247P-A Supplement 2P-A, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods"
  2. Non-proprietary copy of BAW-10247NP-A Supplement 2NP-A, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology for Boiling Water Reactors Supplement 2: Mechanical Methods"
  3. Notarized Affidavit for Withholding of Proprietary Information
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## 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.

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3. I am familiar with the Framatome information contained in the report BAW-10247P-A, Supplement 2P-A, Revision 0, "Realistic Thermal-Mechanical Fuel Rod Methodology For Boiling Water Reactors Supplement 2: Mechanical Methods," dated August 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(a), 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 E. Meg

SUBSCRIBED before me this 29<sup>th</sup>  
day of August, 2018.

Hailey M. Siekawitch

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

