

# framatome

70-1257

February 20, 2019

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U.S. Nuclear Regulatory Commission  
Director, Division of Spent Fuel Management  
Office of Nuclear Material Safety and Safeguards  
Attn: Document Control Desk  
11555 Rockville Pike  
One White Flint North  
Rockville, MD 20852

**Subject: Submittal of Revised Fundamental Nuclear Material Control Plan**

Framatome Inc. has revised the Fundamental Nuclear Material Control Plan (FNMCP) for our Richland WA fuel fabrication facility. The changes do not decrease the effectiveness of the plan and do not require NRC preapproval. The new version, E07-01-001 Version 9.0, is being submitted to the NRC in accordance with the provisions of 10 CFR § 70.32. A copy of the FNMCP is attached. An affidavit stating the proprietary nature of the FNMCP is also attached in accordance with the provisions of 10 CFR § 2.390.

If you have questions, please feel free to contact me at 509-375-8520.

Very truly yours,



Michael J. Wilbricht  
Sr. Safeguards Specialist

c: K. M. Ramsey, U.S. NRC w/o attachments  
N. Pitoniak, NRC Region II w/o attachments

Attachments

1. Fundamental Nuclear Material Control Plan, E07-01-001
2. Proprietary Information Affidavit, Wilbricht February 20, 2019

Framatome Inc.  
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Richland, WA 99354  
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[www.framatome.com](http://www.framatome.com)

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NRC Document Control Desk  
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b.c.  
C. Manning  
T. Tate

File/LB

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COUNTY OF BENTON     )

**Michael J. Wilbricht**, being duly sworn on oath, states as follows:

1. I am employed by Framatome Inc. (Framatome) as the Sr. Safeguards Specialist in Richland, Washington. I am responsible for the overall administration of the nuclear material control and accounting at Framatome's Richland, Washington nuclear fuel fabrication facility. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as the Sr. Safeguards Specialist. This affidavit is submitted in accordance with the provisions of 10 CFR § 2.390.


2. I am familiar with the contents of the "Fundamental Nuclear Material Control Plan", E07-01-001, which provides nuclear material control information for the Framatome Inc., Richland, Washington Fuel Fabrication Facility as required by 10 CFR § 74.31. This document has been classified and designated as "Proprietary" by Framatome in accordance with the document control system and policies established by Framatome for the control and protection of proprietary and confidential information.

3. Framatome is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as Framatome. Competition among these companies including Framatome is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The "Fundamental Nuclear Material Control Plan" contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in this report is commercial and confidential because it reveals specific information about the Framatome Richland manufacturing facility relative to its production throughput. All of this information can be used by competitors to gain undue insight into Framatome's commercial relationships, probable cost structure, operations and business.

5. Framatome Inc. will suffer considerable competitive harm if the contents of "Fundamental Nuclear Material Control Plan" are made available to Framatome domestic and international competitors. Finally, this material cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 20<sup>th</sup> day of February, 2019.



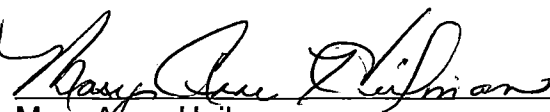
Michael J. Wilbricht  
Sr. Safeguards Specialist

STATE OF WASHINGTON     )  
  :     ss  
COUNTY OF BENTON     )

On this 20<sup>th</sup> day of February, 2019, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Michael Wilbricht to me known to be the Sr. Safeguards Specialist of Framatome Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.





Mary Anne Heilman  
Notary Public in and for the State of Washington,  
residing at Kennewick, Washington.  
My commission expires: June 6, 2020