



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 26, 2019

Mr. Joseph W. Shea
Vice President, Nuclear Regulatory
Affairs and Support Services
Tennessee Valley Authority
Browns Ferry Nuclear Plant
1101 Market Street, LP 4A
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3 – REQUEST FOR
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
(EPID L-2018-LLA-0048)

Dear Mr. Shea:

By letter to the U.S. Nuclear Regulatory Commission (NRC), dated February 23, 2018 (Agencywide Documents Access and Management System Accession No. ML18079B140), Tennessee Valley Authority (TVA) submitted affidavits dated December 22, 2017; March 28, 2017 (two affidavits); January 25, 2017; March 28, 2017, December 22, 2017; February 14, 2018; May 4, 2017; December 1, 2017; March 9, 2017; December 19, 2017; August 31, 2017; and January 25, 2018, executed by Mr. Alan B. Meginnis, Manager, Product Licensing, for AREVA Inc. (currently Framatome), requesting that the information contained in the following documents (Attachments 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29, and 31, respectively, of the TVA letter dated February 23, 2018) be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

Attachment 7

ANP-3551P, Revision 0, "AREVA MELLLA+ Safety Analysis Report for Browns Ferry Units 1, 2, and 3," dated December 2017.

Attachment 9

ANP-3544P, Revision 0, "Browns Ferry EPU (120% OLTP) MELLLA+ Equilibrium Fuel Cycle Design," dated December 2016.

Attachment 11

ANP-3546P, Revision 0, "Browns Ferry Units 1, 2, and 3 LOCA Break Spectrum Analysis for ATIRUM 10XM Fuel (EPU MELLLA+)," dated March 2017.

Attachment 13

ANP-3547P, Revision 0, "Browns Ferry Units 1, 2, and 3 LOCA-ECCS Analysis MAPLHGR Limits for ATIRUM 10XM Fuel (EPU MELLLA+)," dated March 2017.

Attachment 15

ANP-3548P, Revision 0, "Browns Ferry Units 1, 2, and 3 LOCA-ECCS Analysis MAPLHGR Limits for ATRIUM 10 Fuel (EPU MELLLA+)," dated March 2017.

Attachment 17

ANP-3552P, Revision 0, "Browns Ferry Unit 3 Cycle 19 Representative Reload Analysis at EPU MELLLA+," dated December 2017.

Attachment 19

ANP-3553P, Revision 0, "Browns Ferry Unit 3 Cycle 19 EPU (120% OLTP) MELLLA+ LAR Reference Fuel Cycle Design," dated January 2017.

Attachment 21

ANP-3568P, Revision 2, "Fuel Rod Thermal-Mechanical Evaluation for Browns Ferry Extended Power Uprate/MELLLA+," dated February 2018.

Attachment 23

FS1-0029291, Revision 1, "Browns Ferry Units 1, 2, and 3 EPU MELLLA+ MCPR Safety Limit Analysis with SAFLIM3D Methodology," dated May 2017.

Attachment 25

ANP-3550P, Revision 0, "Evaluation of AREVA Fuel Thermal-Hydraulic Performance for Browns Ferry at EPU MELLLA+," dated March 2017.

Attachment 27

ANP-2860P, Revision 2, Supplement 3P, Revision 2, "Browns Ferry Unit 1 - Summary of Responses to Request for Additional Information Extension for Extended Power Flow Operating Domain," dated December 2017.

Attachment 29

ANP-3572P, Revision 0, "Browns Ferry EPU MELLLA+ 10 CFR 50.46c Evaluation," dated August 2017.

Attachment 31

ANP-3633P, Revision 0, "Browns Ferry EPU MELLLA+ CRDA Assessment with DG-1327 Criteria," dated January 2018.

Nonproprietary copies of these documents are provided in Attachments 8, 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, and 32 of the TVA letter dated February 23, 2018.

The AREVA affidavits dated December 22, 2017; March 28, 2017 (2 affidavits); January 25, 2017; March 28, 2017, December 22, 2017; February 14, 2018; May 4, 2017; December 1, 2017; March 9, 2017; December 19, 2017; August 31, 2017; and January 25, 2018, stated that

the submitted documents contain proprietary information that should be considered exempt from mandatory public disclosure of 10 CFR 2.390(b)(4) requirements for the following reasons:

- 6(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.
- 6(d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- 6(e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, based on the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the versions of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions, please contact me at (301) 415-1447 or Farideh.Saba@nrc.gov.

Sincerely,

/RA/

Farideh E. Saba, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-259, 50-260, and 50-296

cc: Alan B. Meginnis
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alan.meginnis@framatome.com

Listserv

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