

framatome

January 23, 2020
TJT:20:003

70-1257

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk (03-H8)
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Subject: Framatome Inc. (Richland) Summary of Facility Changes Made during Calendar Year 2019

Enclosed is a summary of facility changes made since January 1, 2019 which did not require pre-approval.

This summary is being submitted in accordance with 10 CFR 70.72 (d)(2). Framatome requests that this annual update be withheld in its entirety from public disclosure in accordance with 10 CFR 2.390 or 10 CFR 2.790 in that it contains information that is either commercially proprietary in nature or contains security-related information.

Technical contact information relative to the Richland Site ISA is as follows:

Framatome Inc.
Attn: William L. Doane, Manager
Nuclear Safety
2101 Horn Rapids Road
Richland, WA 99354
Phone: 509-375-8717
Email: william.doane@framatome.com

Additionally, I can be reached at 509-375-8550 or via email at timothy.tate@framatome.com.

Very truly yours,



T. J. Tate, Manager
Environmental, Health, Safety & Licensing

c: Osirus Siurano-Perez, NRC

Attachment A: 10CFR70.72 (d)(2) - Required Listing of Changes Not Requiring NRC Pre-Approval.

Framatome Inc.
2101 Horn Rapids Road
Richland, WA 99354
Tel: (509) 375-8100

www.framatome.com

NM5301

AFFIDAVIT

STATE OF WASHINGTON)
 :
COUNTY OF BENTON) ss

Timothy J. Tate, being duly sworn on oath, states as follows:

1. I am employed by Framatome Inc. (Framatome) as Manager, Environmental, Health, Safety and Licensing in Richland, Washington. I am responsible for the overall administration of the safety programs at Framatome's Richland, Washington nuclear fuel fabrication facility, including regulatory licensing and permitting. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as Manager, Environmental, Health, Safety and Licensing.

2. I am familiar with the contents of the "Summary of Facility Changes made During Calendar Year 2019." The Framatome Inc., Richland, Washington Fuel Fabrication Facility "Annual Summary Update of Facility Changes" provides the annual listing of changes to the Richland Site as required by 10CFR70.72 (d)(2). This Annual Summary Update 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.

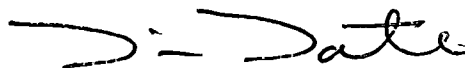
3. Framatome is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside 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 Annual Summary of Facility Changes contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in the Annual of Facility Changes Summary is commercial and confidential because it:

- A. Reveals distinguishing aspects of Framatome's manufacturing processes by relating sequences of operations and/or sub-operations to optimize the efficiency and performance of manufacturing operations which a competitor within the field of nuclear fuel manufacturing may adapt for their own processes, reducing the competitor's expenditure of resources to achieve the same efficiencies, thereby gaining a competitive advantage to the disadvantage of Framatome.
- B. Reveals aspects of privately funded development of process controls and parameters derived by Framatome over the course of optimizing the performance of waste treatment and other processes.
- C. Reveals technical rationale developed by Framatome relating to plant layout, structure, process flow and other technical information which a competitor could readily use without expenditure of funds and replicate in its facilities thereby gaining a competitive advantage to the disadvantage of Framatome.

5. Framatome Inc. will suffer considerable competitive harm if the contents of the Annual Summary of Facility Changes are made available to Framatome domestic and international competitors.

Dated this 23rd day of January, 2020.

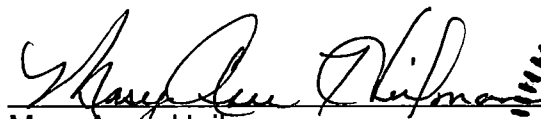


Timothy J. Tate
Manager, Environmental, Health, Safety and Licensing

STATE OF WASHINGTON)
 : ss
COUNTY OF BENTON)

On this 23rd day of January, 2020, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Timothy J. Tate to me known to be the Manager, Environmental, Health, Safety and Licensing 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 Benton, Washington.
MY COMMISSION EXPIRES: June 6, 2020

