

August 7, 2014 NRC:14:050

Mr. James S. Kim, Project Manager Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Mail Stop O8C2A Washington, DC 20555

## Material to Support Entergy Operations, Inc. License Amendment Request

Ref. 1: Letter from Vermont Yankee to NRC dated November 14, 2013, "Technical Specifications Proposed Change No. 306, Eliminate Certain ESF Requirements during Movement of Irradiated Fuel, Vermont Yankee Nuclear Power Station, Docket No. 50-271 License No. DPR-28," (ADAMS Accession Number ML13323A516).

Entergy Operations, Inc. submitted a license amendment request for Vermont Yankee Nuclear Power Station to change the requirements associated with handling irradiated fuel and performing core alterations in its Renewed Facility Operating License and Technical Specifications in Reference 1. In response to this submittal, the NRC requested AREVA Inc. (AREVA) document 32-9053350-001 entitled, "ELISA-2 -A Software Package for the Radiological Evaluation of Licensing and Severe Accidents at Light-Water Nuclear Power Plants Based on the Classical and Alternative-Source-Term Methodologies" dated August 2008.

Enclosed with this letter is the requested document which is considered proprietary in full. As required by 10 CFR 2.390(b) an affidavit is enclosed to support the withholding of the document from public disclosure.

If you have any questions related to this information, please contact Ms. Gayle F. Elliott by telephone at (434) 832-3347, or by e-mail at <u>Gayle.Elliott@areva.com</u>.

Sincerely, Pedro Salas, Directo

Regulatory Affairs AREVA Inc.

cc: J. G. Rowley (w/o Att.) Project 728

## AREVA INC.

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA ) ) ss. CITY OF LYNCHBURG )

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to safeguard the proprietary nature and confidentiality of certain documents stored in the AREVA depository.

3. AREVA recently received a request from the NRC to review the software used in the re-analysis of a Fuel Handling Accident with open containment for the Vermont Yankee Nuclear Power Plant, specifically AREVA Document 32-9053350-001, "ELISA-2 - A Software Package for the Radiological Evaluation of Licensing and Severe Accidents at Light-Water Nuclear Power Plants Based on the Classical and Alternative-Source-Term Methodologies," dated Aug. 2008.

4. This Document contains information that is proprietary and confidential to ENTECH Engineering of Westborough, MA, 01581, the developer and owner of the ELISA-2 software package. AREVA Inc. has secured a license from ENTECH Engineering for the use of the ELISA-2 software, the said license agreement stipulating that AREVA "covenants and agrees to preserve the confidentiality of the Licensed Software, supporting manuals and any other information expressly designated by the Licensor as confidential and proprietary and it shall refrain from disclosing such information (other than to such of the Licensee's employees, contractors, contract personnel or consultants as shall use the Licensed Software only in the ordinary conduct of the Licensee's business) in any form, written or machine readable." 5. AREVA has obtained the consent of ENTECH Engineering (attached hereto) to provide all volumes of this Document, with the exception of Volume C (the original Programmer's Guide and Source Listing for Version 2.1) to the U.S. Nuclear Regulatory
Commission in confidence, with the request that the information contained in these documents be withheld from public disclosure. These documents will be made available in electronic form in the NRC electronic reading room, for review only, and for a limited time.

6. 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."

7. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

SUBSCRIBED before me this AV day of \_\_\_ 2014.

Sherry L. McFaden NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA MY COMMISSION EXPIRES: 10/31/14 Reg. # 7079129

