

October 7, 2014 NRC:14:056

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

Presentation Materials to support the NRC Audit on September 23-24, 2014, regarding Topical Report EMF-2103, Revision 3, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors"

AREVA Inc. (AREVA) and the NRC conducted an audit on September 23-September 24, 2014 regarding the Topical Report EMF-2103, Revision 3, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors." Enclosed with this letter are the Proprietary and Non-Proprietary versions of the viewgraphs that were presented during this audit to support discussions of the topical report.

AREVA considers some of the information contained in the enclosed documents to be proprietary. As required by 10 CFR 2.390(b) an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the presentations are enclosed.

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

Sincerel

Pedro Salas, Difector Regulatory Affairs AREVA Inc.

cc:

J. G. Rowley, NRC Project 728

Enclosures:

- Proprietary version of the September 23-24, 2014 NRC Audit Presentation Materials supporting Topical Report EMF-2103, Revision 3, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors"
- 2. Non-Proprietary version of the September 23-24, 2014 NRC Audit Presentation Materials supporting Topical Report EMF-2103, Revision 3, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors"
- 3. Notarized Affidavit

AREVA INC.

MRR

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)	
)	SS
CITY OF LYNCHBURG)	

- 1. My name is Gayle Elliott. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.
- I am familiar with the criteria applied by AREVA to determine whether certain
 AREVA information is proprietary. I am familiar with the policies established by
 AREVA to ensure the proper application of these criteria.
- 3. I am familiar with the AREVA information contained in the following document: "Presentation Materials to support the NRC Audit on September 23-24, 2014, regarding Topical Report EMF-2103, Revision 3, 'Realistic Large Break LOCA Methodology for Pressurized Water Reactors'," referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. 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 AREVA 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 AREVA to determine whether information should be classified as proprietary:
 - (a) The information reveals details of AREVA'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 AREVA.
 - (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.
 - (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.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(c) and 6(d) above.

- 7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.
- 8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

The foregoing statements are true and correct to the best of my knowledge, 9. information, and belief.

SUBSCRIBED before me this 2nd

day of October

Danita R. Kidd

NOTARY PUBLIC, STATE OF VIRGINIA MY COMMISSION EXPIRES: 12/31/16

Reg. # 205569