



**Enclosures 1 and 3 Contain Proprietary Information
Withhold in Accordance with 10 CFR 2.390**

October 17, 2018

Serial: RA-18-0202

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324
Information Transmittal for NRC Confirmatory Calculations

Reference: Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Request for License Amendment Regarding Application of Advanced Framatome Methodologies*, dated October 11, 2018, ADAMS Accession Number ML18284A395.

Ladies and Gentlemen:

By letter dated October 11, 2018 (i.e., Reference), Duke Energy Progress, LLC (Duke Energy), submitted a license amendment request (LAR) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendment revises Technical Specification 5.6.5.b to allow application of Advanced Framatome Methodologies for determining core operating limits in support of loading Framatome fuel type ATRIUM 11.

The NRC has requested certain information for the purposes of performing Anticipated Transient Without Scram with Instability (ATWS-I) confirmatory calculations using the TRACE computer code. The majority of the information requested was provided in the LAR; this transmittal provides requested information that was not included in the LAR.

Enclosure 1 provides ATRIUM 11 spacer grid information and Enclosure 3 provides regional flux maps and eigenvalues for exposure points of interest. Enclosures 1 and 3 are proprietary in their entirety. Framatome, as owner of the proprietary information, has executed the affidavits provided in Enclosures 2 and 4, which identify the information as proprietary, is customarily held in confidence, and should be withheld from public disclosure in accordance with 10 CFR 2.390.

No regulatory commitments are contained in this letter.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager - Regulatory Affairs, at (910) 832-2487.

Sincerely,



Bryan B. Wooten
Director – Organizational Effectiveness
Brunswick Steam Electric Plant

SBY/sby

Enclosures:

1. ATRIUM 11 Spacer Grid Information [**Proprietary Information – Withhold from Public Disclosure in Accordance with 10 CFR 2.390**]
2. Affidavit for RA-18-0202 Enclosure 1, *ATRIUM 11 Spacer Grid Information*
3. FS1-0040268, *Regional Flux Maps for Advanced Framatome Methods LAR*, Revision 1 [**Proprietary Information – Withhold from Public Disclosure in Accordance with 10 CFR 2.390**]
4. Affidavit for FS1-0040268, *Regional Flux Maps for Advanced Framatome Methods LAR*, Revision 1

cc (with all enclosures):

U.S. Nuclear Regulatory Commission, Region II
ATTN: Ms. Catherine Haney, Regional Administrator
245 Peachtree Center Ave, NE, Suite 1200
Atlanta, GA 30303-1257

U.S. Nuclear Regulatory Commission
ATTN: Mr. Gale Smith, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U.S. Nuclear Regulatory Commission
ATTN: Mr. Andrew Hon (Mail Stop OWFN 8G9A)
11555 Rockville Pike
Rockville, MD 20852-2738

U.S. Nuclear Regulatory Commission
ATTN: Mr. Dennis J. Galvin (Mail Stop OWFN 8B1A)
11555 Rockville Pike
Rockville, MD 20852-2738

cc (with enclosures 2 and 4 only):

Chair - North Carolina Utilities Commission **(Electronic Copy Only)**
4325 Mail Service Center
Raleigh, NC 27699-4300
swatson@ncuc.net

**Affidavit for RA-18-0202 Enclosure 1, *ATRIUM 11 Spacer Grid*
*Information***

A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for Framatome Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by Framatome to determine whether certain Framatome information is proprietary. I am familiar with the policies established by Framatome to ensure the proper application of these criteria.

3. I am familiar with the Framatome information contained in Enclosure 1 to Duke Energy Letter RA-18-0202, "Brunswick Steam Electric Plant, Unit Nos. 1 and 2 Renewed Facility Operating License Nos. DPR-71 and DPR-62 Docket Nos. 50-325 and 50-324 Information Transmittal for NRC Confirmatory Calculations," and referred to herein as "Document." Information contained in this Document has been classified by Framatome as proprietary in accordance with the policies established by Framatome 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 Framatome 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 Framatome to determine whether information should be classified as proprietary:

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

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

7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Framatome policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

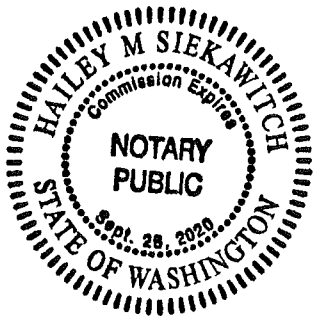
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Ally 3 Meg

SUBSCRIBED before me this 15th
day of October, 2018.

Hailey M. Siekawitch

Hailey M Siekawitch
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 9/28/2020



***Affidavit for FS1-0040268, Regional Flux Maps for Advanced
Framatome Methods LAR, Revision 1***

A F F I D A V I T

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) ss.
COUNTY OF BENTON)

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3. I am familiar with the Framatome information contained in the report FS1-0040268, Revision 1, "Regional Flux Maps for Advanced Framtome Methods LAR," dated October 2018 and referred to herein as "Document." Information contained in this Document has been classified by Framatome as proprietary in accordance with the policies established by Framatome for the control and protection of proprietary and confidential information.

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- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
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8. Framatome policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

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

Alan E. Mag...

SUBSCRIBED before me this 4th
day of October, 2018.

Hailey M. Siekawitch

Hailey M Siekawitch
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 9/28/2020

