

# framatome

PRD0728

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January 17, 2020

NRC:20:002

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 2055-0001

**Voluntary Response to Regulatory Issue Summary (RIS) 2019-03, "Pre-Application Communication and Scheduling for Accident Tolerant Fuel Submittals"**

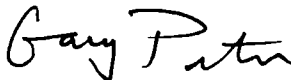
Ref. 1: Regulatory Issue Summary (RIS) 2019-03, "Pre-Application Communication and Scheduling for Accident Tolerant Fuel Submittals," ML19316B342.

In Reference 1, the NRC issued a final Regulatory Information Summary (RIS) 2019-03 that identified questions on the scheduling of Accident Tolerant Fuel (ATF) activities. The staff encouraged vendors to provide voluntary responses to the questions. Enclosure 1 to this letter provides Framatome Inc.'s (Framatome's) voluntary responses to the questions.

Framatome considers some of the material contained in Enclosure 1 to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support withholding of information from public disclosure.

If you have any questions related to this submittal please contact Gayle Elliott by telephone at 434-832-3347 or by e-mail at [Gayle.Elliott@framatome.com](mailto:Gayle.Elliott@framatome.com).

Sincerely,



Gary Peters, Director  
Licensing & Regulatory Affairs  
Framatome Inc.

cc: M. Diaz  
J. G. Rowley  
P. Sahd  
Project 728

**Enclosures:**

1. Framatome's Voluntary Responses to RIS 2019-03 (Proprietary)
2. Framatome's Voluntary Responses to RIS 2019-03 (Non-Proprietary)
3. Notarized Affidavit

YGD1  
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## AFFIDAVIT

1. My name is Gayle Elliott. I am Deputy Director, Licensing & Regulatory Affairs for Framatome Inc. (Framatome) 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 Letter, Gary Peters (Framatome Inc.) to Document Control Desk (NRC), entitled, "Voluntary Response to Regulatory Issue Summary (RIS) 2019-03, "Pre-Application Communication and Scheduling for Accident Tolerant Fuel Submittals," NRC:20:002, dated January 17, 2020 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 this Document is considered proprietary for the reasons set forth in paragraphs 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 has 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.

  
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Gayle Elliott

SUBSCRIBED before me this 17 day of January, 2020.

Neida Hamilton Elder

A circular notary seal for Heidi Hamilton Elder, a Notary Public in the Commonwealth of Virginia. The seal contains the text: HEIDI HAMILTON ELDER, COMMONWEALTH OF VIRGINIA, REGISTRATION NO. 7777873, MY COMM. EXPIRES 12/31/2022, and NOTARY PUBLIC.