



444 South 16th Street Mall  
Omaha NE 68102-2247

August 31, 2007  
LIC-07-0083

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555-0001

References: 1. Docket No. 50-285  
2. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "Fort Calhoun Station Unit No. 1 License Amendment Request (LAR), Modification of the Containment Spray System Actuation Logic," dated July 30, 2007 (LIC-07-0052)

**SUBJECT: Fort Calhoun Station Unit No. 1, Response to Request for Additional Information for License Amendment Request (LAR), "Modification of the Containment Spray System Actuation Logic"**

In Reference 2, the Omaha Public Power District (OPPD) requested changes to the Fort Calhoun Station (FCS) Unit No.1 Operating License No. DPR-40 to modify the containment spray (CS) system actuation logic to preclude automatic start of the containment spray pumps for a loss-of-coolant accident (LOCA). This LAR included a "Summary of FCS Containment Analysis without Containment Spray" produced by AREVA NP, Inc. (AREVA).

During a telephone conference on August 22, 2007, OPPD and AREVA were requested by the NRC (R. Lubel and A. Wang) to provide certain GOTHIC computer code input files used by AREVA for the containment analysis in order for the NRC to perform confirmatory runs. The requested files and instructions for use are included on the enclosed compact disc. These files are considered proprietary to AREVA NP, Inc., as justified in the supporting affidavit (attached).

This letter contains no regulatory commitments.

If you should have any questions regarding this submittal or require additional information, please contact Mr. Thomas C. Matthews at (402) 533-6938.

Sincerely,

David J. Bannister  
Acting Site Director

DJB/TCM/DLL/dll

Enclosure: Compact Disc with GOTHIC input files (Proprietary)  
Attachment: Affidavit for AREVA NP, Inc., Proprietary Information

c: B. S. Mallett, NRC Regional Administrator, Region IV (w/o Attachment/Enclosure)  
A. B. Wang, NRC Project Manager (w/o Attachment/Enclosure)  
J. D. Hanna, NRC Senior Resident Inspector (w/o Attachment/Enclosure)

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**ATTACHMENT**

**Affidavit for AREVA NP, Inc.,  
Proprietary Information**

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA    )  
  ) ss.  
CITY OF LYNCHBURG                )

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

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

3. I am familiar with the AREVA NP GOTHIC files, HL\_CS\_M4.GTH, dated 5/11/2007, PS\_CS\_M4.GTH, dated 5/11/2007, HL\_NS\_M4\_HX.GTH, dated 5/25/2007, and PS\_NS\_M4\_HX.GTH, dated 5/25/2007 and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP 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 NP 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 NP to determine whether information should be classified as proprietary:

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

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

7. In accordance with AREVA NP'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 AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP 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.



SUBSCRIBED before me this 24<sup>th</sup>  
day of August, 2007.



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

