



May 30, 2012  
NRC:12:034

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**ANP-10309P, "U.S. EPR Protection System Technical Report," Revision 4**

- Ref. 1: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), Conversion of ANP-10281P, "U.S. EPR Digital Protection System Topical Report" to ANP-10309P, "U.S. EPR Digital Protection System Technical Report," NRC:09:119, November 24, 2009.
- Ref. 2: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), ANP-10309P, "U.S. EPR Digital Protection System Technical Report," Revision 1, NRC:11:022, March 15, 2011.
- Ref. 3: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), ANP-10309P, "U.S. EPR Digital Protection System Technical Report," Revision 2, NRC:11:047, May 24, 2011.
- Ref. 4: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), ANP-10309P, "U.S. EPR Digital Protection System Technical Report," Revision 3, NRC:11:068, July 1, 2011.

Proposed changes to the instrumentation and controls (I&C) architecture were communicated to the NRC staff in the February 15, 2011 public meeting. The U.S. EPR Digital Protection System Technical Report provided in Reference 1 was revised to incorporate the revised I&C architecture, and was submitted in Reference 2. Revision 2 of this report (Reference 3) was a minor revision to address NRC feedback. Revision 3 of this report (Reference 4) incorporated additional NRC feedback. Additional NRC Staff feedback, in resolution of several Requests for Additional Information (RAI) since that submittal, has been incorporated into a revised "U.S. EPR Protection System Technical Report" (ANP-10309P), Revision 4, which is enclosed with this letter.

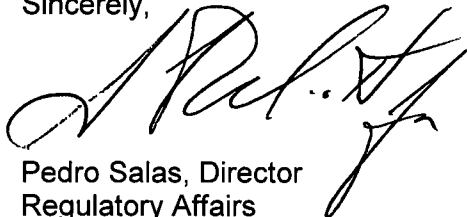
AREVA NP has incorporated this revised report by reference into the U.S. EPR Final Safety Analysis Report (FSAR) as part of the response to RAI 512, Supplement 3. AREVA NP requests that the NRC incorporate the review of this revised report into the evaluation of the I&C design in the Safety Evaluation Report for the U.S. EPR FSAR, in a manner consistent with other reports that are incorporated by reference into the U.S. EPR FSAR.

AREVA NP considers some of the material contained in the enclosure 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.

*DOTT*  
*NRO*

If you have any questions related to this submittal, please contact Mr. Darrell Gardner by telephone at 704-805-2355, or by e-mail to [Darrell.Gardner@areva.com](mailto:Darrell.Gardner@areva.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', with a stylized flourish at the end.

Pedro Salas, Director  
Regulatory Affairs  
AREVA NP Inc.

Enclosures

cc: G. Tesfaye  
Docket No. 52-020

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA                    )  
  ) ss.  
COUNTY OF CAMPBELL                        )

1. My name is Russell Wells. I am U.S. EPR COLA Licensing Manager, for AREVA NP Inc. (AREVA NP) 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 information contained in the document titled ANP-10309P, "U.S. EPR Protection System Technical Report," Revision 4, 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), 6(c), and 6(d) above.

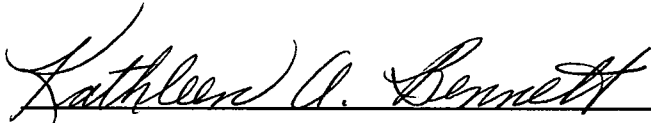
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited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

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SUBSCRIBED before me this 30<sup>th</sup>  
day of May 2012.

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Kathleen A. Bennett  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/2015  
Reg. #110864

