

*"Designated Original"*



April 13, 2012  
NRC:12:021

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

**ANP-10283P, "U.S. EPR Pressure-Temperature Limits Methodology for RCS Heatup and Cooldown," Revision 2**

Ref. 1: E-Mail, Dennis Williford (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 531, Supplement 1," April 13, 2012.

In the response document provided in Reference 1, AREVA NP Inc. (AREVA NP) committed to submit a revision to technical report ANP-10283P. AREVA NP hereby submits ANP-10283P, "U.S. EPR Pressure-Temperature Limits Methodology for RCS Heatup and Cooldown," Revision 2. The section titled "Nature of Changes" identifies the revised sections of the report.

AREVA NP has incorporated this revised report by reference in the U.S. EPR Final Safety Analysis Report (FSAR). AREVA NP requests that the NRC incorporate the review of this revised report into the evaluation of the reactor pressure vessel design in the safety evaluation report for the U.S. EPR FSAR in a manner consistent with other reports which are incorporated by reference in the U.S. EPR FSAR.

AREVA NP considers some of the material contained in the enclosed technical report 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 this technical report are also enclosed.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', is written over a horizontal line.

Pedro Salas  
Director, Regulatory Affairs  
AREVA NP Inc.

Enclosures

cc: G. Tesfaye  
Docket 52-020

**AREVA INC.**  
3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935  
Tel.: 434 832 3000 [www.areva.com](http://www.areva.com)

*DO77  
NRC*

## AFFIDAVIT

NORTH CAROLINA                                 )  
  ) ss.  
MECKLENBURG COUNTY                         )

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, 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 ANP-10283P, "U.S. EPR Pressure-Temperature Limits Methodology for RCS Heatup and Cooldown," Revision 2, 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:

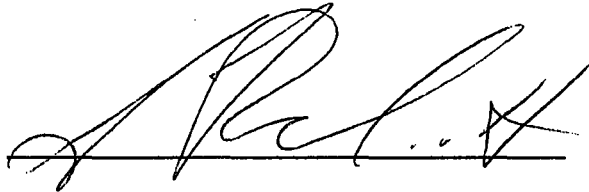
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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 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.

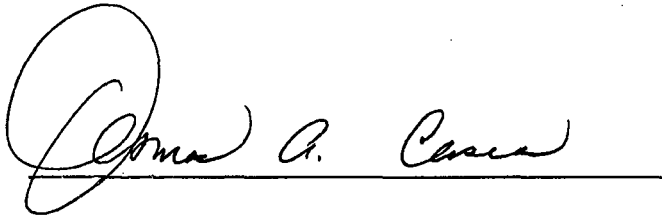
8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

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 13<sup>th</sup>

day of April, 2012.

A handwritten signature in black ink, appearing to be 'Thomas A. Casias', written over a horizontal line.

Thomas A. Casias  
NOTARY PUBLIC, NORTH CAROLINA, MECKLENBURG COUNTY  
MY COMMISSION EXPIRES: 12/15/2014