



April 9, 2013
NRC:13:017

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Submittal of Revised U.S. EPR Human Factors Engineering (HFE) Implementation Plans

- Ref. 1: E-mail, Getachew Tesfaye (NRC) to Ronda Pederson, et al (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 336 (4016, 4043), FSAR Ch. 18," February 2, 2010.
- Ref. 2: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of Revised HFE Implementation Plan," NRC 11:053, May 31, 2011.
- Ref. 3: E-mail, Dennis Williford (AREVA NP Inc.) to Document Control Desk (NRC), "Response to U.S. EPR Design Certification Application RAI No. 336, Supplement 2," April 9, 2013.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR Design Certification application (i.e., RAI No. 336).

In Reference 2, AREVA NP Inc. (AREVA NP) submitted the following two Human Factors Engineering (HFE) implementation plans:

- 118-9042375-005, "U.S. EPR Human System Interface Design Implementation Plan"
- 118-9110637-003, "U.S. EPR HFE Program Management Plan"

In Reference 3, AREVA NP provided RAI 336, Supplement 2 containing a revised final response to Question 18-84. This response included a commitment to provide revisions to the above HFE implementation plans.

Enclosed with this letter are the documents, ANP-10327P, "U.S. EPR HFE Program Management Plan," and ANP-10328P, "U.S. EPR Human System Interface Design Implementation Plan," containing complete revisions to the U.S. EPR Implementation Plans, which fulfills the commitment made in Reference 3. These revisions also include editorial and format changes, as well as the conversion of the document to an AREVA NP Technical Report.

AREVA NP considers some of the material contained in the enclosed to be proprietary. As required by 10 CFR 2.390(b), an affidavit is attached to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the enclosures to this letter are provided.


AREVA NP INC.

3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935
Tel.: 434 832-3000 - www.aveva.com

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NRO

If you have any questions related to this information, please contact Len Gucwa by telephone at (434) 832-3466, or by e-mail at len.gucwa.ext@areva.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', with a long horizontal stroke extending to the right.

Pedro Salas, Director
Regulatory Affairs
AREVA NP Inc.

Enclosures:

1. Proprietary Version of ANP-10328P, "U.S. EPR Human System Interface Design Implementation Plan"
2. Non-Proprietary Version of ANP-10328NP, "U.S. EPR Human System Interface Design Implementation Plan"
3. Proprietary Version of ANP-10327P, "U.S. EPR HFE Program Management Plan"
4. Non-Proprietary Version of ANP-10327NP, "U.S. EPR HFE Program Management Plan"
5. Notarized Affidavits

cc: A. M. Snyder
Docket 52-020

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
COUNTY OF CAMPBELL)

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 the document titled "ANP-10328P, 'U.S. EPR Human System Interface Design Implementation Plan' Technical Report," 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:

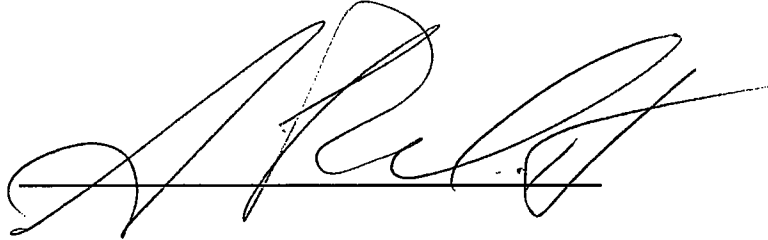
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or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

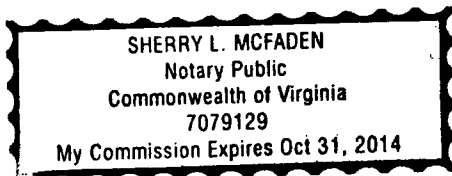
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

A large, stylized handwritten signature in black ink, written over a horizontal line.

SUBSCRIBED before me this 9th
day of April 2013.

A handwritten signature in black ink, written over a horizontal line.

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/2014
Reg. #7079129



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COMMONWEALTH OF VIRGINIA)
) ss.
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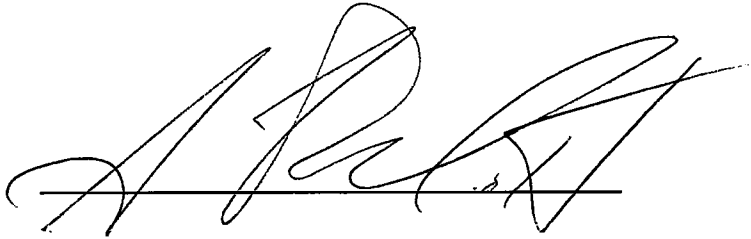
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