



April 19, 2013  
NRC:13:019

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

**Response to U.S. EPR Design Certification Application RAI 505, Supplement 29**

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application. To address NRC Staff supplemental comments concerning the Response to Question 07.01-35, a schedule for a revised final Response to Question 07.01-35, and a history of the prior supplemental responses were provided in Supplement 28 (Reference 2) on April 1, 2013.

The enclosure to this letter provides a final Response to Question 07.01-35 that includes affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format. The enclosure also includes a redline-strikeout format of AREVA NP Inc. (AREVA NP) Technical Reports ANP-10315P (submitted in Reference 3), ANP-10309P (submitted in Reference 4), and ANP-10310P (submitted in Reference 5), which supports the response to Question 07.01-35.

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 enclosure to this letter are provided.

The following table indicates the respective pages in the enclosure that contain the response provided by AREVA NP to the subject question.

Question #	Start Page	End Page
RAI 505 — 07.01-35	2	20

The schedule for a complete final response to the remaining question is unchanged as shown in the following table.

Question #	Response Date
RAI 505 — 07.01-33	July 30, 2013

**AREVA NP INC.**

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

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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](mailto:Len.Gucwa.ext@areva.com).

Sincerely,



Pedro Salas, Director  
Regulatory Affairs  
AREVA NP Inc.

Enclosures:

1. Proprietary Response to U.S. EPR Design Certification Application RAI 505, Supplement 29
2. Non-Proprietary Response to U.S. EPR Design Certification Application RAI 505, Supplement 29
3. Notarized Affidavit

cc: A. M. Snyder  
Docket 52-020

References

- Ref. 1: E-mail, Getachew Tesfaye (NRC) to Dennis Williford, et al. (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 505 (5902, 5735, 5869, 5754, 5803, 5950, 5744), FSAR Ch. 7," August 30, 2011.
- Ref. 2: E-mail, Dennis Williford (AREVA NP Inc.) to Amy Snyder (NRC), "Response to U.S. EPR Design Certification Application RAI No. 505 (5902, 5735, 5869, 5754, 5803, 5950, 5744), FSAR Ch. 7, Supplement 28," April 01, 2013.
- Ref. 3: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "ANP-10315P, 'U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report', Revision 1," NRC:11:061, June 13, 2011.
- Ref. 4: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "ANP-10309P, 'U.S. EPR Protection System Technical Report', Revision 4," NRC:12:034, May 30, 2012.
- Ref. 5: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of ANP-10310P, 'Methodology for 100% Combinatorial Testing of the U.S. EPR™ Priority Module Technical Report,' Revision 1," NRC:11:031, March 29, 2011.

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA            )  
  ) ss.  
CITY OF LYNCHBURG                    )

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 "Response to U.S. EPR Design Certification Application RAI 505, Supplement 29," 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:

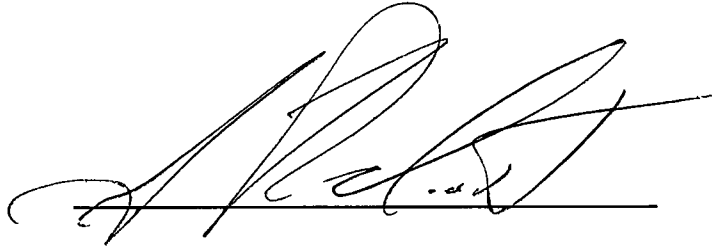
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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 handwritten signature in black ink, appearing to be 'S. L. McFaden', written over a horizontal line.

SUBSCRIBED before me this 19<sup>th</sup>  
day of April 2013.

A handwritten signature in black ink, appearing to be 'Sherry L. McFaden', written over a horizontal line.

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

