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April 23, 2015
Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Jeff Ciocco
Division of New Reactor Licensing

Docket No. 52-046
MKD/NW-15-0009L

Subject: Revised Response to RAI 2-7371

Reference: NRC Request for Additional Information 2-7371, dated March 11, 2014

KHNP is hereby submitting revised response to the Request for Additional Information (RAI) 2-7371, dated March 11, 2014 as discussed with the NRC staff during the teleconference held on March 30, 2015. This RAI response addresses questions 16 of the RAI 2-7371.

Enclosure 1 contains one copy of the associated affidavit. Enclosure 2 provides Revised Response to RAI 2-7371 on Topical Report "Fluidic Device Design for the APR1400" APR1400-Z-M-TR-12003-P, Rev.0 (Proprietary), and Enclosure 3 provides Revised Response to RAI 2-7371 on Topical Report "Fluidic Device Design for the APR1400" APR1400-Z-M-TR-12003-NP, Rev.0 (Non-proprietary).

If additional information or clarification is required, please contact Yunho Kim, director of KHNP Washington DC center at yunho.kim@khnp.co.kr or 703-388-0592.

Sincerely,

Myung-Ki Kim
Project Manager
Advanced Reactors Development Laboratory
Korea Hydro and Nuclear Power Co., Ltd

Enclosures:

1. Affidavit KAW-15-0009
2. Revised Response to RAI 2-7371 on Topical Report "Fluidic Device Design for the APR1400" APR1400-Z-M-TR-12003-P, Rev.0 (Proprietary)
3. Revised Response to RAI 2-7371 on Topical Report "Fluidic Device Design for the APR1400" APR1400-Z-M-TR-12003-NP, Rev.0 (Non-proprietary)

ENCLOSURE 1

Affidavit KAW-15-0009

I, Jae-yong Lee, state the following:

1. I am the General Manager of Korea Hydro & Nuclear Power Co., Ltd. (KHNP), and as such I am authorized to request withholding the information transmitted with this letter from public disclosure and to execute this affidavit.
2. I am familiar with the criteria applied by KHNP to determine whether certain information is proprietary, and with the policies established by KHNP to ensure the proper application of these criteria.
3. The information, Revised Response to RAI 2-7371 on Topical Report “Fluidic Device Design for the APR1400” APR1400-Z-M-TR-12003-P, Rev.0 (Proprietary), transmitted with this letter has been classified by KHNP as proprietary in accordance with the policies for the control and protection of proprietary and confidential information. The information regarded as proprietary is identified and marked consistent with the requirements of 10 CFR 2.390, § (b)(1)(i). Accordingly, the proprietary information is enclosed within brackets and the right-hand bracket carries a notation of “TS” to indicate that the trade secret nature of the information claimed to be proprietary is the basis for proposing that the information so identified be withheld from public disclosure.
4. Pursuant to the considerations set forth in 10 CFR Section 2.390(a), KHNP considers the information classified as proprietary to be “trade secret” information since it is design, analysis, or test information that would be difficult for a competitor to reproduce and hence provides an economic and competitive advantage to KHNP.
5. The need for designating the information as proprietary has been raised within KHNP. The information is being treated proprietary and confidential and has not been disclosed by KHNP to the public.
6. Nondisclosure of the proprietary information transmitted with this letter is vital to the competitiveness held by KHNP and, hence, disclosure of the proprietary information transmitted in with this letter would have negative commercial impacts on the competitive position of KHNP in the U.S. nuclear market.
7. In accordance with KHNP policy, proprietary information contained in this document may be, or may have been, made available on a limited basis to regulatory bodies, customers, potential customers, and their agents, suppliers, and licensees, and others under suitable agreements providing for nondisclosure and limited use of the information.



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I declare that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed on April 23, 2015.



Jae-yong Lee

General Manager

APR1400 Licensing Team

Central Research Institute

Korea Hydro & Nuclear Power Co., Ltd.