



May 11, 2015
NRC:15:021

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

Response to Request for Comment on Draft Safety Evaluation for AREVA Inc. Topical Report EMF-2328(P)(A), Revision 0, Supplement 1, Revision 0, "PWR Small Break LOCA Evaluation Model, S-RELAP5 Based" (TAC No. ME8227)

In Reference 1, the NRC issued a draft safety evaluation (SE) on EMF-2328(P)(A), Revision 0, Supplement 1, Revision 0, "PWR Small Break LOCA Evaluation Model, S-RELAP5 Based" requesting that AREVA Inc. (AREVA) review the document for proprietary material and for factual errors.

AREVA reviewed the draft SE and determined that the draft SE contains information that was identified in the topical report (Reference 2) and RAI responses (Reference 3 and Reference 4) as being proprietary information. A number of technical corrections were also identified. Attachment 1 to this letter provides a marked-up copy of the draft SE showing the proprietary information and identifying technical corrections. Attachment 2 provides a list of the suggested changes to the SE.


In addition, a replacement for Figure 3.2 on page 3-4 of the submitted supplement (Reference 2) is needed. It was determined through the draft SE review that Figure 3.2 as submitted, although correct for the expected use as a part of this topical report, was not consistent with the intent of the text, which was to explain how the topical was used prior to the approval of this supplement. Figure 3.2 will be replaced to be consistent with the text of the "Approved" version of EMF-2328(P)(A) Revision 0, Supplement 1, Revision 0, when submitted to the NRC.

AREVA considers some of the information contained in the enclosed Attachments to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed (Attachment 3) to support withholding the information from public disclosure.

If you have any questions related to this letter please contact Mr. Morris E. Byram, Product Licensing Manager, by telephone at 434-832-4665 or by e-mail at Morris.Byram@areva.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "Philip A. Opoul".

 Pedro Salas, Director
Licensing & Regulatory Affairs
AREVA Inc.

AREVA INC.

3315 Old Forest Road, Lynchburg, VA 24501
Tel.: 434 832 3000 - www.areva.com

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NRK

cc: J. G. Rowley
Project 728

References:

- Ref. 1: Letter, Anthony J. Mendiola (NRC) to Pedro Salas (AREVA Inc.), "Draft Safety Evaluation for AREVA NP Inc. Topical Report EMF-2328(P)(A), Revision 0, Supplement 1, Revision 0, 'PWR [Pressurized Water Reactor] Small Break LOCA [Loss-of-Coolant Accident] Evaluation Model, S-RELAP5 Based' (TAC NO. ME8227)," April 22, 2015.
- Ref. 2: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of EMF-2328(P)(A), Revision 0, Supplement 1, Revision 0, 'PWR Small Break LOCA Evaluation Model, S-RELAP5 Based'," NRC:12:012, March 2, 2012.
- Ref. 3: Letter, Pedro Salas (AREVA Inc.) to Document Control Desk (NRC), "Response to Request for Additional Information Regarding EMF-2328(P)(A), Revision 0, Supplement 1, Revision 0, 'PWR Small Break LOCA Evaluation Model, S-RELAP5 Based'," NRC:14:032, June 6, 2014.
- Ref. 4: Letter, Pedro Salas (AREVA Inc.) to Document Control Desk (NRC), "Revised Response to Request for Additional Information Regarding EMF-2328(P)(A), Revision 0, Supplement 1, Revision 0, 'PWR Small Break LOCA Evaluation Model, S-RELAP5 Based'," NRC:14:055, October 3, 2014.

Attachments:

1. Mark-up of Draft Safety Evaluation for EMF-2328(P)(A), Revision 0, Supplement 1, Revision 0, "PWR Small Break LOCA Evaluation Model, S-RELAP5 Based"
2. Summary Table of Proprietary Information and Technical Corrections
3. Notarized Affidavit

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is David K. White. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in the following document: "Draft Safety Evaluation for EMF-2328(P)(A), Revision 0, Supplement 1, Revision 0, 'PWR Small Break LOCA Evaluation Model, S-RELAP5 Based'," referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. 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 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 to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA'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.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(c) and 6(d) above.

7. In accordance with AREVA'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 only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA 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.

David K. White

SUBSCRIBED before me this 11th
day of May, 2015.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

