

**KHNP****KOREA HYDRO & NUCLEAR POWER CO., LTD**

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July 1, 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-15-0038L

Subject: Response to RAI 20-7912

Reference: NRC Request for Additional Information 20-7912, dated June 1, 2015

KHNP is hereby submitting response to RAI 20-7912, dated June 1, 2015.

Enclosure 1 contains one copy of the associated affidavit. Enclosure 2 provides the Response to RAI 20-7912 (Non-Proprietary). Attachments 1 and 3 of Enclosure 2 contain computer code input files, which are provided in a CD, and have proprietary information.

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,

Jae-yong Lee
Project Manager
Advanced Reactors Development Laboratory
Korea Hydro and Nuclear Power Co., Ltd

Enclosure:

1. Affidavit KAW-15-0038
2. Response to RAI 20-7912 (Non-Proprietary)

Enclosure 1

Affidavit KAW-15-0038

I, Jae-yong Lee, state the following:

1. I am the Director 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, Attachments 1 and 3 of Enclosure 2, 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).
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.

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

Executed on July 1, 2015.



Jae-yong Lee
Project Manager
Advanced Reactors Development Laboratory
Korea Hydro and Nuclear Power Co., Ltd

Enclosure 2

Response to RAI 20-7912

(Non-Proprietary)

July 1, 2015