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March 8, 2018

Document Control Desk

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Attention: Mr. William Ward

Division of New Reactor Licensing

Docket No. 52-046

MKD/NW-18-0033L

**Subject:            Submittal of Revised EQ Program and Onsite AC Power System Analysis  
                         Technical Reports**

**References:        1. KHNP Letter MKD/NW-17-0071L, Submittal of Revised Technical  
                         Reports for APR1400, dated March 17, 2014  
                         2. KHNP Letter MKD/NW-16-1181L, Response to RAI 527-8686 Questions  
                         03.11-18 thru 03.11-24, dated January 4, 2017  
                         3. KHNP Letter MKD/NW-17-0374L, Revised Response to RAI 176-8089  
                         for the Question 03.11-9 (Rev.04), dated December 15, 2017**

The purpose of this letter is to transmit two sets of revised technical reports for APR1400 Design Certification.

One set is related to APR1400 Equipment Qualification Program. The prior version of the reports had been submitted under the Reference 1. This revision incorporates the RAI responses under the reference 2 and 3.

The other set is associated with on-site AC power system analysis for APR1400 design. The prior version of the reports had also been transmitted under the Reference 1. This revision mainly addresses updates to the analysis that take into account up-to-date loads information.

Enclosure 1 contains a copy of the associated affidavit. Enclosures 2 to 5 provide electronic copies of either proprietary or non-proprietary version of each set of the revised technical reports.

If additional information or clarification required, please contact Daegeun Ahn, Director of KHNP Washington DC Center, at [ahn.daegeun@khnp.co.kr](mailto:ahn.daegeun@khnp.co.kr) or 703-388-0592.

Sincerely,

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Han-gon Kim

Project Manager

Advanced Reactors Development Laboratory

Korea Hydro and Nuclear Power Co., Ltd

Enclosures:

1. Affidavit KAW-18-0033
2. Equipment Qualification Program (Proprietary) (APR1400-E-X-NR-14001-P, Rev.2)
3. Equipment Qualification Program (Non-Proprietary) (APR1400-E-X-NR-14001-NP, Rev.2)
4. Onsite AC Power System Analysis (Proprietary) (APR1400-E-E-NR-14001-P, Rev.3)
5. Onsite AC Power System Analysis (Non-Proprietary) (APR1400-E-E-NR-14001-NP, Rev.3)

## **Enclosure 1**

### **Affidavit KAW-18-0033**

I, Yun-ho Kim, 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, APR1400-E-X-NR-14001-P and APR1400-E-E-NR-14001-P, 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 March 8, 2018

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Yun-ho Kim  
General Manager  
APR1400 Licensing Team  
Central Research Institute  
Korea Hydro and Nuclear Power Co., Ltd

## **Enclosure 2**

APR1400-E-X-NR-14001-P, Rev.2

Equipment Qualification Program

(Proprietary)

### **Enclosure 3**

APR1400-E-X-NR-14001-NP, Rev.2

Equipment Qualification Program

(Non-proprietary)

## **Enclosure 4**

APR1400-E-E-NR-14001-P, Rev.3

Onsite AC Power System Analysis

(Proprietary)

## **Enclosure 5**

APR1400-E-E-NR-14001-NP, Rev.3

Onsite AC Power System Analysis

(Non-proprietary)