



Proj 733

October 31, 2006  
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Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Request for Review and Approval of ANP-10268P Revision 0, "U.S. EPR Severe Accident Evaluation Topical Report"**

Ref.: 1. SECY-93-087, "Policy, Technical, and Licensing Issues Pertaining to Evolutionary and Advanced Light Water Reactor (ALWR) Designs," April 2, 1993.

AREVA NP, Inc (AREVA NP) requests the NRC's review of the enclosed topical report ANP-10268P Revision 0, "U.S. EPR Severe Accident Evaluation Topical Report." This topical report describes the experimental programs and analytical models that form the technical bases underlying both the evaluation of the severe accident performance of the U.S. EPR, which will be based on the guidance provided in Reference 1, and the phenomenological analyses supporting the U.S. EPR Probabilistic Risk Assessment (PRA). The report provides a description of the severe accident mitigation systems of the U.S. EPR and the experimental programs that have supported their design and assessment of their functional capabilities. The report also discusses the computer models that have been developed and are utilized to analyze the severe accident performance of the U.S. EPR, and provides examples of the results of those analyses.

AREVA NP requests that the NRC issue a Safety Evaluation Report (SER) that concludes that the technical bases for severe accident assessment, including the testing programs and the models and methods used for severe accident analyses, are adequate to meet the intent of the policies established in SECY-93-087 and to support the U.S. EPR PRA. AREVA NP plans to reference the approved version of the topical report in its Design Control Document (DCD) and in the PRA for the U.S. EPR.

AREVA NP requests that the NRC complete its review of the topical report by September 2007. This schedule supports completion of the DCD and PRA for submittal to the NRC as planned later in 2007.

A proprietary version and a non-proprietary version of the report are provided on the enclosed CDs.

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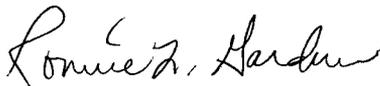
**AREVA NP INC.**  
An AREVA and Siemens company

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AREVA NP considers some of the material contained in enclosed documents to be proprietary. As required by 10 CFR 2.390(a)(4), an affidavit is enclosed to support the withholding of the information from public disclosure.

Ms. Sandra M. Sloan, Regulatory Affairs Manager for New Plants Deployment, remains the point of the contact with the NRC for U.S. EPR licensing activities. She may be reached by telephone at 434-832-2369, or by e-mail at [sandra.sloan@areva.com](mailto:sandra.sloan@areva.com).

Sincerely,



Ronnie L. Gardner, Manager  
Site Operations and Regulatory Affairs  
AREVA NP Inc.

Enclosures

cc: L. J. Burkhart  
G. Tesfaye  
Project 733

A F F I D A V I T

STATE OF VIRGINIA        )  
  ) ss.  
CITY OF LYNCHBURG        )

1. My name is Ronnie L. Gardner. I am Manager, Site Operations and Regulatory Affairs, for AREVA NP Inc. 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 report ANP-10268P Revision 0, "U. S. EPR Severe Accident Evaluation Topical Report," dated October 2006, 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(a), 6(b), and 6(c) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document have 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.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Ronnie J. Gardner

SUBSCRIBED before me this 31<sup>st</sup>  
day of October, 2006.

Ella F. Carr-Payne

Ella F. Carr-Payne  
NOTARY PUBLIC, STATE OF VIRGINIA  
MY COMMISSION EXPIRES: 08/31/2009

ELLA F. CARR-PAYNE  
NOTARY PUBLIC  
Commonwealth of Virginia  
My Commission Expires 8-31-09