

February 8, 2008 NRC:08:011

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

U.S. EPR Component Manufacturing Schedules and Locations

Ref.: 1. NRC Regulatory Issue Summary 2007-08, "Updated Licensing Submittal Information to Support the Design-Centered Licensing Review Approach," April 16, 2007.

Ref.: 2. Letter, Rod M. Krich (Unistar Nuclear) to Document Control Desk (NRC), "Response to Regulatory Issue Summary 2007-08, 'Updated Licensing Submittal Information to Support the Design-Centered Licensing Review Approach'," UN #07-005, May 31, 2007.

On April 16, 2007, the NRC issued Regulatory Issue Summary (RIS) 2007-08 (Reference 1) requesting information regarding standardization and schedules for submitting applications for early site permit, combined license, or standard design certification. Regarding plant construction information, the RIS indicates that onsite observation of vendor activities will require preparation and travel—including international travel. Thus, the NRC requested that vendors provide schedules for designing, manufacturing, fabricating, and testing of safety-related components to help the NRC plan their audits and inspections.

On May 31, 2007, UniStar Nuclear submitted the combined response for the U.S. EPR Design Centered Working Group (DCWG) to the RIS (Reference 2). The letter provided some information concerning manufacturing long lead components. At this time, AREVA NP Inc. (AREVA NP) is able to provide NRC more detailed information that can better support the NRC planning activities. The information is provided as an enclosure to this letter. However, the NRC should bear in mind that the information remains preliminary and is subject to change.

AREVA NP considers some of the material be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the information are enclosed.

If you have any questions related to this submittal, please contact Ms. Sandra M. Sloan, Regulatory Affairs Manager for New Plants Deployment. She may be reached by telephone at 434-832-2369 or by e-mail at sandra.sloan@areva.com.

Sincerely,

Ronnie L. Gardner, Manager

Site Operations and Corporate Regulatory Affairs

AREVA NP Inc.

AREVA NP INC.

An AREVA and Siemens company

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Enclosures

cc: J. Rycyna G. Tesfaye Project 733

AFFIDAVIT

STATE OF VIRGINIA)	
)	SS
CITY OF LYNCHBURG)	

- My name is Pedro Salas. I am Technical Consultant, New Plants
 Deployment Licensing, 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 "AREVA NP Inc. Response to RIS 2007-08: Long Lead Time Components," 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 will 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(b) and 6(e) above.

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



SUBSCRIBED before me this _______

day of February, 2008.

Sherry L. McFaden

NOTARY PUBLIC, STATE OF VIRGINIA MY COMMISSION EXPIRES: 10/31/2010

Registration #7079129

SHERRY L. MCFADEN
Notary Public
Commonwealth of Virginia
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My Commission Expires Oct 31, 2010