



June 13, 2008
NRC:08:039

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

Response to Second Request For Additional Information Regarding ANP-10278P, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report" (TAC NO. MD4978)

- Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10278P Revision 0, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report', " NRC:07:010, March 26, 2007.
- Ref. 2: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Request for Additional Information Regarding ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report' (TAC No. MD4978)," July 20, 2007.
- Ref. 3: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to an RAI on the Topical Report ANP-10278P 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report'," NRC:07:035, August 17, 2007.
- Ref 4: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Second Request for Additional Information Regarding ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report' (TAC NO. MD4978)," May 15, 2008.
- Ref 5: Letter, Getachew Tesfaye (NRC) to Sandra M. Sloan (AREVA NP Inc.), "AREVA NP Inc. – U.S. EPR Standard Design Certification Application Review Schedule," March 26, 2008.

AREVA NP Inc. (AREVA NP) requested the NRC's review and approval of topical report ANP-10278P Revision 0, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report" in Reference 1. A request for additional information (RAI) was provided by the NRC in Reference 2. The response to that RAI was provided in Reference 3. A second RAI was provided by the NRC in Reference 4. The response to that RAI is enclosed with this letter, ANP-10278Q2 Revision 0, "Response to Second Request for Additional Information—ANP-10278P." In addition to the responses to the questions posed by the NRC staff in Reference 4, the enclosed response also revises one of the responses (i.e., Response to Question 3B) provided in Reference 3.

AREVA NP referenced this topical report in the Final Safety Analysis Report for the U.S. EPR. Reference 5 states that the NRC plans to complete its review and issue the draft safety evaluation by July 15, 2008. AREVA NP understands that this timely response to the RAI supports the scheduled deliverable of the draft safety evaluation.

AREVA NP considers some of the material contained in the attachments to this letter to 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

AREVA NP INC.
An AREVA and Siemens company

3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935
Tel.: 434 832 3000 - Fax: 434 832 3840 - www.aveva.com

DO77
NRO

enclosure to this letter are provided on the enclosed CDs. In addition, the response to RAI-12 provides a data file. This data file is also provided on the enclosed CDs.

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,

A handwritten signature in black ink, appearing to read "Ronnie L. Gardner", is written over the typed name.

Ronnie L. Gardner, Manager
Corporate Regulatory Affairs
AREVA NP Inc.

Enclosures

cc: J. Rycyna
G. Tesfaye
Docket No. 52-020

AFFIDAVIT

STATE OF VIRGINIA)
) ss.
COUNTY OF CAMPBELL)

1. My name is Ronda M. Pederson. I am Licensing Manager, Regulatory Affairs for New Plants Deployment, 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 attachments to letter NRC:08:039, the enclosed *Response to Second Request For Additional Information Regarding ANP-10278P, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report" (TAC NO. MD4978)*, 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(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 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.

Andrea M. Feder

SUBSCRIBED before me this 12th
day of June, 2008.

Kathleen A. Bennett

Kathleen A. Bennett
NOTARY PUBLIC, STATE OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/2011

