



July 7, 2008  
NRC:08:060

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

**Response to U.S. EPR Design Certification Application RAI No. 6**

Ref.: 1. E-mail, Getachew Tesfaye (NRC) to Ronda Pederson, et al (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 6," June 5, 2008.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application. Technically correct and complete responses to 22 of the 43 questions along with partial responses to two questions are enclosed with this letter. The remaining RAI responses (Questions 78, 79, 84, 86a, 87, 89, 90, 91, 92, 93, 101, 105, 106, 114, 115, 117, 118, 119, 120b, 121, and 124) will be provided by August 8, 2008.

The enclosed response consists of the following:

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RAI 6 —19-78	2	3
RAI 6 —19-79	4	4
RAI 6 —19-80	5	5
RAI 6 —19-81	6	36
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RAI 6 —19-83	58	60
RAI 6 —19-84	61	61
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RAI 6 —19-87	73	73
RAI 6 —19-88	74	74
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RAI 6 —19-91	77	77
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RAI 6 —19-98	122	122
RAI 6 —19-99	123	128
RAI 6 —19-100	129	129
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**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

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RAI 6 —19-108	148	148
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RAI 6 —19-118	181	181
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Appended to this response is Appendix A containing supporting information for RAI 19-95 and an affected page of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which supports the response to RAI 6 Question 19-84.

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 enclosure to this letter are provided.

The provided response meets the NRC's stated expectation and supports the established review schedule for the U.S. EPR design certification application.

Sincerely,

Handwritten signature of Sandra M. Sloan, with the word "for" written above the signature.

Sandra M. Sloan, Manager  
New Plants Deployment 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 the enclosed CD, "Response to U.S. EPR Design Certification Application RAI No. 6," 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.

Aonda M. Peden

SUBSCRIBED before me this 7<sup>th</sup>  
day of July, 2008.

Kathleen A. Bennett

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

