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July 24, 2008
NRC:08:050

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

Response to a Request for Additional Information Regarding ANP-10285P, "U.S. EPR Fuel Assembly Mechanical Design Topical Report" (TAC No. MD7040)

- Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10285P, 'U.S. EPR Fuel Assembly Mechanical Design Topical Report'," NRC:07:051, October 2, 2007.
- Ref. 2: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Request for Additional Information Regarding ANP-10285P, 'Fuel Assembly Mechanical Design Topical Report, (TAC No. MD7040)'," June 24, 2008.
- Ref. 3: 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-10285P, "U.S. EPR Fuel Assembly Mechanical Design Topical Report" in Reference 1. The NRC provided a second Request for Additional Information (RAI) regarding this topical report in Reference 2. The response to this RAI is enclosed in Attachment A to this letter. Tables and figures that are referenced in the RAI response are provided in Attachments B and C, respectively. Attachment D contains proposed marked-up pages to the Fuel Assembly Mechanical Design Topical Report. Attachments E through I contain additional supporting information for the RAI response.

AREVA NP references the topical report ANP-10285P in the Final Safety Analysis Report for the U.S. EPR. Reference 3 states that the NRC plans to complete its review of the topical report and issue the draft safety evaluation by August 21, 2008.

AREVA NP understands that this timely response to the RAI supports the scheduled deliverable of the draft safety evaluation.

As noted in the response to RAI-29, an additional CD is enclosed which provides supporting input data for the Small-Break Loss-of-Coolant Accident (SBLOCA) and Realistic Large-Break Loss-of-Coolant Accident (RLBLOCA) initialization results. The information contained in this CD is entirely proprietary.

AREVA NP INC.
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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 enclosures to this letter are 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,



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

Enclosures

cc: J. Rycyna
G. Tesfaye
Docket 52-020

AFFIDAVIT

STATE OF VIRGINIA)
COUNTY OF CAMPBELL) ss.

1. My name is Ronda M. Pederson. I am the 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:08:050, *Response to a Request for Additional Information Regarding ANP-10285P, "U.S. EPR Fuel Assembly Mechanical Design Topical Report" (TAC No. MD7040)* and the CD containing supporting input data, and referred to herein as "Documents." Information contained in these Documents 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. These Documents contain 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 these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents

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 these Documents 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 these Documents 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.

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.

Qonda M. Pede

SUBSCRIBED before me this 24th
day of July 2008.

Kathleen A. Bennett

Kathleen A. Bennett
NOTARY PUBLIC, STATE OF VIRGINIA
MY COMMISSION EXPIRES: 08/31/2011

