



August 8, 2008
NRC:08:056

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

Response to U.S. EPR Design Certification Application RAI No. 6, Supplement 1

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.

Ref. 2: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Response to U.S. EPR Design Certification Application RAI No. 6," NRC:08:060, Rev. 1, July 8, 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 23 of the 43 questions were provided in Reference 2. The remaining RAI responses are provided with this letter. A complete answer is not provided for RAI 6, Question 19-117. A technically correct and complete response to RAI 6, Question 19-117b will be provided by November 7, 2008.

The enclosed response consists of the following:

Question #	Start Page	End Page
RAI 6 —19-79	2	102
RAI 6 —19-84	103	164
RAI 6 —19-86a	165	165
RAI 6 —19-87	166	186
RAI 6 —19-89	187	195
RAI 6 —19-90	196	210
RAI 6 —19-91	211	220
RAI 6 —19-92	221	224
RAI 6 —19-93	225	227
RAI 6 —19-101	228	238
RAI 6 —19-105	239	239
RAI 6 —19-106	240	267
RAI 6 —19-114	268	280
RAI 6 —19-115	281	281
RAI 6 —19-117	282	283
RAI 6 —19-118	284	284
RAI 6 —19-119	285	286
RAI 6 —19-120b	287	288
RAI 6 —19-121	289	296
RAI 6 —19-124	297	456

Appended to this response are affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which support the associated responses to RAI 6.

As noted in response to RAI 6, Question 19-121, an additional CD is enclosed which provides supporting input data. The information on this CD is entirely proprietary.

AREVA NP considers some of the material contained on the CDs 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 on the enclosed CDs.

Sincerely,



Sandra M. Sloan, Manager
New Plants Deployment Regulatory Affairs
AREVA NP Inc.

Enclosures

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

A F F I D A V I T

STATE OF VIRGINIA)
) ss.
COUNTY OF BENTON)

1. My name is Ronda M. Pederson. I am Licensing Manager, U.S. EPR Design Certification, 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 supporting CD and response document enclosed with the letter, "Response to U.S. EPR Design Certification Application RAI No. 6, Supplement 1" and referred to herein as "Documents." Information contained in these Documents have 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.



SUBSCRIBED before me this 8th
day of August, 2008.



Ella F. Carr-Payne
NOTARY PUBLIC, STATE OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/2009

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