



August 22, 2008  
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Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Response to U.S. EPR Design Certification Application RAI No. 15, Supplement 1**

Ref. 1: E-mail, Getachew Tesfaye (NRC) to AREVA NP Inc., "U.S. EPR Design Certification Application RAI No. 15, FSAR Ch 4," June 23, 2008.

Ref. 2: E-mail, Ronda M. Pederson (AREVA NP) to Getachew Tesfaye (NRC), et al., "Response to U.S. EPR Design Certification Application RAI No. 15, FSAR Ch 4," July 17, 2008.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application. As noted in Reference 2, AREVA NP indicated that the response to RAI No. 15, Questions 04.05.01-1 and 04.05.01-3 would be submitted to the NRC by August 22, 2008. Accordingly, technically correct and complete responses to RAI No. 15, Questions 04.05.01-1 and 04.05.01-3 are enclosed with this letter.

The enclosed response consists of the following:

Question #	Start Page	End Page
RAI 15—04.05.01-1	2	35
RAI 15—04.05.01-3	36	36

Appendix A to this response contains affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which supports the response to RAI No. 15, Questions 04.05.01-1 and 04.05.01-3.

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.

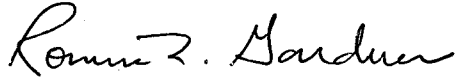
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**AREVA NP INC.**  
An AREVA and Siemens company

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Tel.: 434 832 3000 - Fax: 434 832 3840 - www.aveva.com

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](mailto: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

COMMONWEALTH OF VIRGINIA      )  
  )  
CITY OF LYNCHBURG                                    ) ss.  
  )

1. My name is Ronnie L. Gardner. I am Manager, Corporate Regulatory Affairs 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 *U.S. EPR Design Certification Application RAI No. 15, Supplement 1, Question 04.05.01-1,* dated August 22, 2008, 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 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.

Ronnie Z. Gardner

SUBSCRIBED before me this 22<sup>nd</sup>  
day of August, 2008.

Sherry L. McFaden

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/10  
Reg. # 7079129

