



September 5, 2008
NRC:08:068

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

Response to U.S. EPR Design Certification Application RAI No. 33

Ref. 1: E-mail, Getachew Tesfaye (NRC) to Ronda Pederson, et al (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 33," August 7, 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 all of the questions are enclosed with this letter.

The enclosed response consists of the following:

Question #	Start Page	End Page
RAI 33 — 04.03-1	2	2
RAI 33 — 04.03-2	3	5
RAI 33 — 04.03-6	6	7
RAI 33 — 04.06-1	8	8
RAI 33 — 04.06-2	9	10

The appendix 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. 33, Questions 04.06-1 and 04.06-2.

AREVA NP Inc. considers some of the material contained in the enclosure 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.

Sincerely,

A handwritten signature in cursive script that reads "Sandra M. Sloan".

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

Enclosures

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

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.

Ronda M. Beder

SUBSCRIBED before me this 5th
day of September, 2008.

Kathleen A. Bennett

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

