



September 19, 2008  
NRC:08:073

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

**Response to U.S. EPR Design Certification Application RAI No. 17, 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. 17, FSAR Ch 11 and 15," June 18, 2008

Ref. 2: E-mail, Ronda Pederson (AREVA NP Inc.) to Getachew Tesfaye, "Response to U.S. EPR Design Certification Application RAI No. 17, FSAR Ch. 11 and 15," July 16, 2008

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application (i.e., RAI No. 17). Technically correct and complete responses were provided to 28 of the 35 questions in Ref. 2.

Technically correct and complete responses are provided to the remaining 7 of the 35 questions.

The enclosed response consists of the following:

| <b>Question #</b>  | <b>Start Page</b> | <b>End Page</b> |
|--------------------|-------------------|-----------------|
| RAI 17—15.00.03-19 | 2                 | 2               |
| RAI 17—15.00.03-23 | 3                 | 3               |
| RAI 17—15.00.03-24 | 4                 | 6               |
| RAI 17—15.00.03-25 | 7                 | 10              |
| RAI 17—15.00.03-26 | 11                | 12              |
| RAI 17—15.00.03-27 | 13                | 15              |
| RAI 17—15.00.03-30 | 16                | 20              |

AREVA NP considers some of the material contained in the enclosure 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



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(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.

*Donald M. Bede*

SUBSCRIBED before me this 19th  
day of September, 2008.

*Kathleen A. Bennett*

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

