AREVA

September 11, 2008
NRC:08:066

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

Request for Review and Approval of BAW-10192P Revision 2, "BWNT LOCA – BWNT Loss of Coolant Accident Evaluation Model for Once-Through Steam Generator Plants"

On behalf of the PWR Owners Group, AREVA NP Inc. (AREVA NP) requests the NRC's review and approval of the enclosure, BAW-10192P, "BWNT LOCA – BWNT Loss of Coolant Accident Evaluation Model for Once-Through Steam Generator Plants."

AREVA NP requests that the NRC issue a Safety Evaluation Report (SER) that approves this topical report which will be used to support the B&W designed operating plants. AREVA NP requests that the NRC complete its review of the enclosed report and issue the SER by September 2009.

Revision 2 of this topical report incorporates changes to the NRC-approved Revision 0 topical report. Revision 2 updates references to NRC-approved topical reports completed after the original topical was approved. It also provides additional details and expanded discussions of changes to the BWNT LOCA Evaluation Model for B&W-designed plants made under 10 CFR 50.46 to ensure compliance to Appendix K of 10 CFR 50. The text changes are identified with margin bars to help facilitate the NRC's review. A table identifying the changes in Revision 2 is attached to further clarify the changes to the Revision 0 text. Revision 1 of the topical was submitted for review in 2000, but was withdrawn without the NRC's review.

AREVA NP considers some of the material contained in the enclosed document to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of information from public disclosure. Proprietary and non-proprietary versions of the topical report are enclosed.

AREVA NP INC.
An AREVA and Siemens company

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If you have any questions related to this submittal, please contact Ms. Gayle Elliott, Product Licensing Manager. She may be reached by telephone at 434-832-3347, or by e-mail at gayle.elliott@areva.com.

Sincerely,

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

Enclosure

cc: H. D. Cruz
Project 694

bcc: NRC:08:066
R. L. Baxter
M. J. Burzynski
G. F. Elliott
R. L. Gardner
A. Jirapongmed
G. L. Pannell
R. J. Schomaker
S. M. Sloan

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, 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 BAW-10192P, Revision 2, "BWNT LOCA – BWNT Loss of Coolant Accident Evaluation Model for Once-Through Steam Generator Plants," dated August 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.

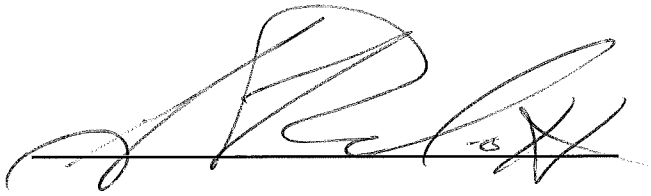
(e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

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.



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

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

SHERRY L. MCFADEN
Notary Public
Commonwealth of Virginia
7079129
My Commission Expires Oct 31, 2010