



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 Revision 1 of the topical was submitted for review in 2000, but was withdrawn without the NRC's review.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.

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

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](mailto:gayle.elliott@areva.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Ronnie L. Gardner". The signature is fluid and cursive, with a large initial "R" and "G".

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

Enclosure

cc: H. D. Cruz  
Project 694



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:

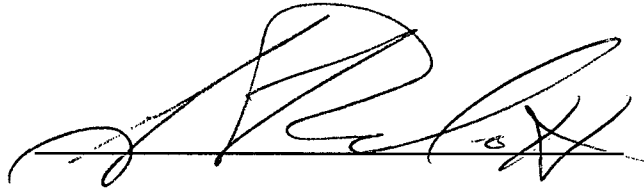
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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 5<sup>th</sup>  
day of September, 2008.



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

