



April 2, 2009  
NRC:09:036

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

**Response to Fourth Request for Additional Information Regarding ANP-10278P, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report" (TAC No. MD4978)**

- Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10278P Revision 0, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report'," NRC:07:010, March 26, 2007.
- Ref. 2: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to an RAI on the Topical Report ANP-10278P 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report'," NRC:07:035, August 17, 2007.
- Ref. 3: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to Second Request For Additional Information Regarding ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report' (TAC No. MD4978)," NRC:08:039, June 13, 2008.
- Ref. 4: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to Third Request For Additional Information Regarding ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report' (TAC No. MD4978)," NRC:08:105, December 19, 2008.
- Ref. 5: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Supplemental Response to Third Request For Additional Information Regarding ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report' (TAC No. MD4978)," NRC:09:030, March 31, 2009.
- Ref. 6: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Fourth Request for Additional Information Regarding ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report,' (TAC No. MD4978)," January 28, 2009.

AREVA NP Inc. (AREVA NP) requested the NRC's review and approval of topical report ANP-10278P Revision 0, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report" in Reference 1. In this regard, AREVA NP Inc. provided additional information to the NRC in References 2 through 5. The NRC made a fourth request for additional information in Reference 6. A response to the three questions posed in Reference 6 is provided in the attachment to this letter.

AREVA NP considers some of the material contained in the attachment to this letter to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of

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

3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935  
Tel.: 434 832 3000 - Fax: 434 832 3840 - www.aveva.com

D077  
NRO

the information from public disclosure. Proprietary and non-proprietary versions of the enclosure to this letter are provided on the enclosed CDs.

If you have any questions related to this submittal, please contact Ms. Sandra M. Sloan, Regulatory Affairs Manager for New Plants, by telephone at 434-832-2369 or by e-mail to [sandra.sloan@areva.com](mailto:sandra.sloan@areva.com).

Sincerely,



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

Enclosures

cc: 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.

Donna M. Pedem

SUBSCRIBED before me this 2<sup>nd</sup>  
day of April, 2009.

Kathleen A. Bennett

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

