



May 13, 2009

NRC:09:055

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

Response to U. S. EPR Standard Design Certification Request for Additional Information No. 171, FSAR Ch. 18, Supplement 4

- Ref. 1: E-mail, Getachew Tesfaye (NRC) to Ronda Pederson, et al (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 171 (1879), FSAR Ch. 18," January 14, 2009.
- Ref. 2: E-mail, Ronda Pederson (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 171 (1879), FSAR Ch. 18," February 13, 2009.
- Ref. 3: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Response to U.S. EPR Design Certification Application RAI No. 171, Supplement 1," NRC:09:019, March 13, 2009.
- Ref. 4: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Response to Request for Additional Information No. 171, Rev 0, Regarding "U. S. EPR Standard Design Certification AREVA NP Inc. Docket No. 52-020 SRP Section: 18 - Human Factors Engineering," NRC:09:031, April 17, 2009.
- Ref. 5: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Response to U.S. EPR Standard Design Certification Request for Additional Information No. 171, FSAR Ch. 18, Supplement 3," NRC:09:047, April 29, 2009.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application. Reference 2 provided a response to RAI 171, and a schedule indicating when the documents requested in RAI 171 would be provided. AREVA NP Inc. (AREVA NP) provided 9 of the 10 documents requested in References 3, 4, and 5. Enclosed with this letter is the last of the requested documents, AREVA NP Document Number 118-9018214-002, "Function Analysis and Functional Allocation Implementation Plan."

AREVA NP INC.
An AREVA and Siemens company

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Tel.: (434) 832-3000 - Fax: (434) 832-3840

FORM: 22709VA-1 (4/1/2009)

DO77
NRC

AREVA NP considers the document to be proprietary in its entirety; therefore, a non-proprietary version is not submitted. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

Sincerely,

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

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

Enclosure

cc: G. Tesfaye
Docket No. 52-020

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is George L. Pannell. I am Manager, Product Licensing, for AREVA NP Inc. (AREVA NP) 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 the document entitled, "118-9018214-002 Function Analysis and Allocation Implementation Plan," 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) 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.

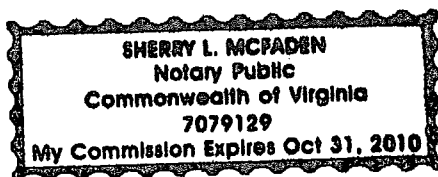
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

George Parnell

SUBSCRIBED before me this 11th
day of May 2009.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/2010
Registration # 7079129



Response to
Request for Additional Information No. 171, Supplement 4

1/14/2009

U. S. EPR Standard Design Certification
AREVA NP Inc.
Docket No. 52-020
SRP Section: 18 - Human Factors Engineering
Application Section: All

QUESTIONS for Operating Licensing and Human Performance Branch
(AP1000/EPR Projects) (COLP)

Question 18-34:

Information used as a basis for verifying implementation of NUREG-0711 criteria for the Human Factors Engineering Program must be docketed. It is the basis for the staff's conclusion on reasonable assurance of safety. As discussed in the 12/18/08 audit with AREVA, please provide the latest revisions of the following documents:

1. Inheritance Implementation Plan (upon completion)
2. HSI Design Implementation Plan #118-9042375-001
3. HFE Design Implementation Plan #118-9047891-000
4. Verification & Validation Implementation Plan #118-9046087-000
5. U.S. EPR Implementation Plan for the Integration of Human Reliability Analysis (HRA) into the Human Factors Engineering (HFE) Program #118-9038835-001
6. Human Performance Monitoring Implementation Plan #118-9051755-001
7. Operating Experience Review Implementation Plan #118-9023868-001
8. Function analysis and allocation Implementation Plan #118-9018214-001
9. Initial Staffing Assumptions for the U.S. EPR #117-9015723-001
10. Concept of Operations for the US EPR Control Room #118-9023868-001

Response to Question 18-34:

Enclosed is the following document:

Document No.	Title
118-9018214-002	Function Analysis and Functional Allocation Implementation Plan

FSAR Impact:

The U.S. EPR FSAR will not be changed as a result of this question.