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

**Response to a Draft Request for Additional Information Regarding ANP-10298(P),
“ACE/ATRIUM 10XM Critical Power Correlation”**

Ref. 1: Letter, Ronnie L Gardner (AREVA NP Inc.) to Document Control Desk (NRC), Request for Review and Approval of ANP-10298P, Revision 0, “ACE/ATRIUM 10XM Critical Power Correlation”, NRC: 08:100, December 29, 2008.

Ref. 2: Email, Holly C. Cruz (NRC) to Gayle F. Elliott (AREVA NP Inc.) “Preliminary ‘Draft’ RAIs for AREVA TR ANP-10298 ACE/ATRIUM 10XM,” March 31, 2009.

AREVA NP Inc. (AREVA NP) requested the NRC’s review and approval of the topical report ANP-10298(P) in Reference 1. The NRC provided a draft request for additional information (RAI) regarding this topical report in Reference 2. The response to questions 2 through 7 of this request are enclosed with this letter as an attachment. The response to question 1 will be submitted to the NRC following the QA review of the supporting calculations.

AREVA NP considers some of the material contained in the attachments 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 attached RAI responses are provided.

If you have any questions related to this submittal, please contact Mr. Alan B. Meginnis, Product Licensing Manager by telephone at 509-375-8266 or by e-mail at alan.meginnis@areva.com.

Sincerely,

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

Enclosures

cc: H. D. Cruz
R. Subbaratnam
Project 728

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NRR

AREVA NP INC.
An AREVA and Siemens company

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 these Documents is considered proprietary for the reasons set forth in paragraphs 6(b), 6(d) and 6(e) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in these Documents 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.

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SUBSCRIBED before me this 10th
day of June, 2009.

Susan K. McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/10/12

