



June 11, 2009  
NRC:09:063

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

**Request for Review and Approval of ANP-10303P, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report"**

Ref. 1: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "U.S. EPR Instrumentation and Controls Topical Reports," NRC: 09:004, January 23, 2009.

Ref. 2 Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "AREVA NP Response to Review Status of the ANP-10272, 'Software Program Manual For TELEPERM XS Safety Systems Topical Report' (TAC No. MD3971)," NRC:09:035, April 7, 2009.

AREVA NP Inc. (AREVA NP) requests the NRC's review and approval of the enclosure, ANP-10303P, Revision 0, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report." AREVA NP notified NRC of its intention to submit this report in Reference 1.

This topical report describes the Simulation Validation Test Tool (called SIVAT) developed by AREVA NP to support the development of project-related TELEPERM XS Application Software. This report describes:

- The concept of TELEPERM XS simulation and the principles of operation for the SIVAT Tool and;
- The high quality development process used to develop the SIVAT Tool.

The use of a NRC-approved simulation validation tool has been described in AREVA NP document ANP-10272, Draft Revision 1, Software Program Manual for TELEPERM XS™ Safety Systems Topical Report, which was submitted to NRC in Reference 2. The use of the SIVAT Tool to support TELEPERM XS Application Software validation has important benefits. The early detection of Application Software faults through validation testing with SIVAT serves to reduce project risks earlier in the development process.

AREVA NP requests that the NRC issue a Safety Evaluation Report that approves ANP-10303P. AREVA NP intends to use the SIVAT Tool to support validation testing of TELEPERM XS Application Software developed in accordance with the TELEPERM XS Software Program Manual. AREVA NP requests that the NRC complete its review of the enclosed report and issue the SER by June 2010.

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MRR

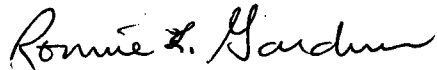
**AREVA NP INC.**  
An AREVA and Siemens company

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AREVA NP considers some of the material contained in the topical report 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 topical report are provided on the enclosed CDs.

If you have any questions related to this submittal, please contact Mr. Mark Burzynski, Manager, Product Licensing. He may be reached by telephone at 434-832-4695 or by e-mail at [Mark.Burzynski@areva.com](mailto:Mark.Burzynski@areva.com).

Sincerely,



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

Enclosures

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

AFFIDAVIT

COMMONWEALTH OF VIRGINIA     )  
  )  
CITY OF LYNCHBURG            )     ss.

1. My name is Mark J. Burzynski. 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 the report ANP-10303P, Revision 0, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report" and referred to herein as the "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 this Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c) and 6(d) 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.

Mandy Burzynski

SUBSCRIBED before me on this 8<sup>th</sup>  
day of June, 2009.

Sherry L. McFaden

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

