



April 17, 2009
NRC:09:031

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

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"

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.

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, Rev. 0 and a schedule indicating when the documents requested in RAI 171 would be provided. AREVA NP Inc. (AREVA NP) provided 4 of the 10 documents requested in Reference 3. Enclosed with this letter are 4 additional documents as requested in Reference 1. To date, 8 documents have been submitted with 2 documents remaining to be submitted as shown in the table below.

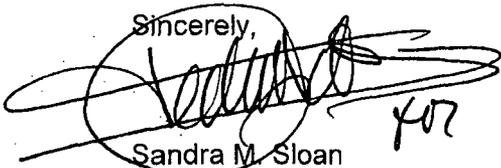
Document	Commitment Date
Implementation Plan for the Integration of HRA into the HFE Program #118-9038835-001	4/29/2009
Function Analysis and Allocation Implementation Plan #118-9018214-001	5/13/2009

The following table indicates the respective pages in the response document, "RAI 171 Supplement 2 Response US EPR DC.pdf," that contain AREVA NP's response to the subject questions.

Question #	Start Page	End Page
RAI 171 — 18-34	2	2

AREVA NP considers the four documents to be proprietary in their entirety and they are on the enclosed CD; therefore, non-proprietary versions are 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 black ink, appearing to read 'Sandra M. Sloan', is written over a circular stamp. To the right of the signature, the number '407' is handwritten.

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

Enclosure

cc: G. Tesfaye
Docket No. 52-020

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 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.

George Powell

SUBSCRIBED before me this 15th
day of April 2009.

Sherry L. McFaden

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

