



March 13, 2009  
NRC:09:019

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

**Response to U.S. EPR Design Certification Application RAI No. 171, Supplement 1**

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.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application (i.e., RAI No. 171). In Reference 2, AREVA NP Inc. (AREVA NP) provided a schedule indicating when the documents requested in RAI No. 171 would be provided.

Four of the ten documents requested are enclosed with this letter. The submittal of one of the documents requested, "Implementation Plan for the Integration of HRA into the HFE Program," #118-9038835-001, has been rescheduled from March 13, 2009 to April 29, 2009.

The schedule for submitting the remaining requested AREVA NP documents has been changed and is as follows:

<b>Document</b>	<b>Commitment Date</b>
Inheritance Implementation Plan (document number to be determined)	4/22/2009
Verification & Validation Implementation Plan #118-9046087-000	4/22/2009
Implementation Plan for the Integration of HRA into the HFE Program #118-9038835-001	4/29/2009
Operating Experience Review Implementation Plan #118-9023868-001	4/22/2009
Function Analysis and Allocation Implementation Plan #118-9018214-001	5/13/2009
Concept of Operations for the U.S. EPR Control Room # 117-9039988-001	4/22/2009

Document Control Desk  
March 13, 2009

NRC:09:019  
Page 2

AREVA NP's response to Request for Additional Information No. 171, Supplement 1 indicates the four documents provided in this submittal. AREVA NP considers the four documents to be proprietary in their entirety; 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,

*SMS*  


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

Enclosure

cc: G. Tesfaye  
Docket No. 52-020



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 these Documents 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 Pannell

SUBSCRIBED before me this 6th  
day of March 2009.

Sherry L. McFaden

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

