



July 31, 2009
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Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Response to U. S. EPR Design Certification RAI No. 240, FSAR Ch. 18, 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. 240, FSAR Ch. 18," June 5, 2009.

Ref. 2: E-mail, Ronda Pederson (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 240, FSAR Ch. 18," July 8, 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 schedule for response to the one question of RAI 240. A technically correct and complete response is enclosed with this letter.

The following table indicates the respective pages in the enclosed response document that contain the AREVA NP Inc. (AREVA NP) response to the subject question.

Question #	Start Page	End Page
RAI 240 — 18-36	2	6

Appended to the RAI response document are affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which support the response to RAI 240 Question 18-36.

Also enclosed are the following AREVA NP documents, referred to in the RAI response document:

- U.S. EPR™ Task Analysis Implementation Plan
- U.S. EPR™ Human Factors Procedure Implementation Plan
- U.S. EPR™ HFE Project Management Plan
- U.S. EPR™ Human Factors Training Implementation Plan
- SRP Chapter 18 Compliance Document

In addition to the enclosed documents, AREVA NP previously submitted 10 documents in response to U.S. EPR Design Certification Application RAI No. 171. The enclosed documents complete the suite of documents supporting the NRC review of U.S. EPR FSAR Tier 2, Chapter 18.

AREVA NP INC.
An AREVA and Siemens company

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FORM 22709VA-1 (4/1/2006)

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NRO

AREVA NP considers the enclosed documents listed above to be proprietary in their 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.

This concludes the formal AREVA NP response to RAI 240, and there are no questions from this RAI for which AREVA NP has not provided responses.

Sincerely,



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 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.

Greg Powell

SUBSCRIBED before me this 24th
day of July 2009.

Sherry L. McFaden

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

