



December 10, 2009  
NRC:09:123

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

**Response to U.S. EPR Design Certification Application RAI No. 266, Supplement 2**

- Ref. 1: E-mail, Getachew Tesfaye (NRC) to Ronda Pederson, et al (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 266," September 10, 2009.
- Ref. 2: E-mail, Ronda Pederson, et al (AREVA NP Inc.), to Getachew Tesfaye (NRC), "RE: U.S. EPR Design Certification Application RAI No. 266," October 12, 2009.
- Ref. 3: E-mail, Ronda Pederson, et al (AREVA NP Inc.), to Getachew Tesfaye (NRC), "Response Supplement 1 to U.S. EPR Design Certification Application RAI No. 266," November 4, 2009.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application. Reference 2 provided technically correct and complete responses to 1 of the 15 questions. A technically correct and complete response to 1 of the 14 remaining questions is enclosed with this letter.

The enclosed response consists of the following:

Question #	Start Page	End Page
RAI 266 — 06.02.01 - 47	2	2

Enclosed with this letter please find a CD containing proprietary data files in support of the response to RAI 266 Question 06.02.01-47, as follows:

- U.S. EPR GOTHIC 7.2b Multi-Node LBLOCA Input Model, consisting of the following file:
  - clps\_np\_s\_sd3.GTH (CLPS Break, double ended guillotine break, failure of one train ECCS)
- U.S. EPR GOTHIC 7.2b Multi-Node MSLB Input Model, consisting of the following file:
  - e20d41\_23.GTH (MSLB from 20% power, double ended guillotine break located in the accessible space, failure of one MSIV)

Reference 3 provided a schedule for the response to Questions 06.02.01.02-2, 06.02.01.02-3, 06.02.01.02-4. A response to Question 06.02.01.03-2 cannot be provided at this time. The schedule for technically correct and complete responses to the remaining RAI No. 266 questions has been changed and is provided below.

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

3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935  
Tel.: (434) 832-3000 • Fax: (434) 832-3840

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

DO77  
NRC

Question #	Response Date
RAI 266 — 06.02.01-48	February 25, 2010
RAI 266 — 06.02.01.02-2	May 5, 2010
RAI 266 — 06.02.01.02-3	May 5, 2010
RAI 266 — 06.02.01.02-4	May 5, 2010
RAI 266 — 06.02.01.03-2	February 25, 2010
RAI 266 — 06.02.01.03-3	February 25, 2010
RAI 266 — 06.02.01.04-2	February 25, 2010
RAI 266 — 06.02.01.04-3	February 25, 2010
RAI 266 — 06.02.01.04-4	February 25, 2010
RAI 266 — 06.02.01.04-5	February 25, 2010
RAI 266 — 06.02.01.04-6	December 18, 2009
RAI 266 — 06.02.01.04-7	December 18, 2009
RAI 266 — 06.02.02-33	June 30, 2010

Proprietary and non-proprietary versions of the attachments are provided on the enclosed CDs. AREVA NP considers the data files enclosed with the proprietary version to be proprietary in their entirety and thus the non-proprietary version contains only the response document. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

Sincerely,



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

Enclosures

cc: G. Tesfaye  
Docket No. 52-020

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

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AFFIDAVIT

COMMONWEALTH OF VIRGINIA            )  
  ) ss.  
COUNTY OF CAMPBELL                 )

1. My name is Ronda Pederson. I am Licensing Manager, U.S. EPR Design Certification, Regulatory Affairs for New Plants, 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 letter NRC:09:123, "Response to U.S. EPR Design Certification Application RAI No. 266, Supplement 2," and referred to herein as "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 the Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) 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.

Ronda M Pedersen

SUBSCRIBED before me this 10<sup>th</sup>  
day of December, 2009.

Kathleen A. Bennett

Kathleen A. Bennett  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/2011

