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

**Submittal of ANP-10306P, "Comprehensive Vibration Assessment Program for U.S. EPR™ Reactor Internals Technical Report"**

Ref. 1: E-mail, Getachew Tesfaye (NRC) to Ronda Pederson, et al. (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 245 (2981, 3036), FSAR Ch. 3," July 10, 2009.

AREVA NP Inc. (AREVA NP) is submitting the enclosed ANP-10306P, "Comprehensive Vibration Assessment Program for U.S. EPR™ Reactor Internals Technical Report." This report describes the comprehensive vibration program for the U.S. EPR reactor internals that verifies the structural integrity of the reactor internals for flow induced vibration.

AREVA NP will incorporate this report by reference in Chapter 3 of the U.S. EPR Final Safety Analysis Report (FSAR). AREVA NP requests that the NRC incorporate the review of this report into the safety evaluation report for the U.S. EPR FSAR in a manner consistent with other reports which are incorporated by reference in the U.S. EPR FSAR.

Markups to the U.S. EPR FSAR to reference this technical report will be provided with the response to several questions in a supplemental response to RAI 245 (Reference 1).

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

Sincerely,

A handwritten signature in cursive script that reads "Sandra M. Sloan".

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

Enclosures

cc: G. Tesfaye  
Docket No. 52-020

DO77  
NRO



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.

*Jonda M. Beder*

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

