



December 17, 2009

NRC:09:132

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

Response to U.S. EPR Design Certification Application RAI No. 265, 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. 265 (3358), FSAR Ch 3," September 16, 2009.

Ref 2: E-mail, Ronda Pederson, (AREVA NP Inc.) to Getachew Tesfaye (NRC), et al, "Response to U.S. EPR Design Certification Application RAI No. 265, FSAR Ch 3," October 16, 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. 265). In Reference 2, AREVA NP provided technically correct and complete responses to 1 of the 7 questions and indicated that the responses to the remaining questions would be provided to the NRC by December 18, 2008. As committed, technically correct and complete responses the remaining 6 questions to RAI No. 265 are enclosed with this letter.

The enclosed response consists of the following:

Question #	Start Page	End Page
RAI 265 — 03.06.03-20	2	3
RAI 265 — 03.06.03-21	4	7
RAI 265 — 03.06.03-22	8	9
RAI 265 — 03.06.03-23	10	12
RAI 265 — 03.06.03-25	13	14
RAI 265 — 03.06.03-26	15	15

Also enclosed are affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which support the response to RAI 265, Supplement 1, Question 03.06.03-23. Also enclosed with this response are the following documents which support the responses to Questions 03.06.03-22 and 03.06.03-26:

- Updated Moment Versus Leakage Crack Lengths
- Leak-Before-Break (LBB) Finite Element Analysis (FEA) for the U.S. EPR Surge Line (SL)
- Updated Flaw Stability Analysis

This concludes the formal AREVA NP response to RAI 265, and there are no questions from this RAI for which AREVA NP has not provided responses.

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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 enclosure to this letter are provided on the enclosed CDs.

If you have any questions related to this submittal, please contact me by telephone at 434-832-2369 or by e-mail at sandra.sloan@areva.com.

Sincerely,



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

Enclosures

cc: G. Tesfaye
Docket No. 52-020

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.

Sandra M. Sloan

SUBSCRIBED before me this *18th*
day of December, 2009.

Kathleen A. Bennett

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

