



Rolls-Royce

Rolls-Royce Civil Nuclear SAS

23, Chemin du Vieux Chêne,

38246 Meylan Cedex - France

Tél: +33 (0)4 76 61 15 00

www.rolls-royce.com

Affidavit

In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," Rolls-Royce Civil Nuclear SAS ("RRCN") requests withholding from public disclosure of the documents listed in Table 1, which is attached to this affidavit. As required by 10 CFR 2.390, RRCN has included in Table 1 the following information:

- Identity of the document or part sought to be withheld;
- Declaration of the basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a);
- Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public; and
- Locations in the documents of all information sought to be withheld.

As required in § 2.390(b)(4); RRCN wishes to note that the request for withholding from public disclosure applies to pages that contain commercially sensitive information that RRCN normally discloses only under a Non-Disclosure Agreement (NDA). This commercially sensitive information is not available in public sources and is the type of information customarily held in confidence by RRCN and our competitors. RRCN is transmitting this information to NRC in confidence.

As noted in Table 1, release of this information in a public forum could cause harm to RRCN by revealing trade secrets and/or commercially sensitive design and operational details and technical processes related to designing, building, and/or operating a *SPINLINE 3* digital safety instrumentation and control system.

As Rolls-Royce Civil Nuclear SAS Deputy Technical Director, I am responsible for reviewing the information sought to be withheld, and I am authorized to apply for its withholding on behalf of RRCN.

Jean-Pierre Burel
Deputy Technical Director
Rolls-Royce Civil Nuclear SAS

3 January 2010

Vu pour légalisation de la signature
de M. BUREL Jean-Pierre
apposée ci-contre,

Meylan, le 07 JAN. 2010
P/Le Maire l'Agent délégué



Table 1. Documents requested for withholding from public disclosure

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld (Notes 1, 2 and 3)
Quality Audit Report	28-I&C US-2008			Rolls-Royce Civil Nuclear SAS would be harmed by disclosure of the details of a QA audit performed by DS&S, LLC. This audit reveals commercially sensitive information about the RRCN SAS quality management system.	Entire document (see Note 3)
DS&S 10CFR50 Appendix B / 10CFR21 Checklist, July 21 - 25, 2008	DS&S 10CFR50 Appendix B / 10CFR21 Checklist, July 21 - 25, 2008	Entire document	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce Civil Nuclear SAS would be harmed by disclosure of the details of in this checklist, which is a detailed supplement to Audit Report 28-I&C US-2008. This audit checklist reveals commercially sensitive information about the RRCN SAS quality management system.	Entire document (see Note 3)
Data Systems & Solutions RTS Business Unit - Entergy Supplier Audit Number SA08-007	SA08-007			DS&S, LLC (dba Rolls-Royce Civil Nuclear) would be harmed by disclosure of the details of a QA audit performed by a third-party. This audit reveals commercially sensitive information about the DS&S, LLC quality management system.	Entire document (see Note 3)

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld (Notes 1, 2 and 3)
Quality Procedure - Dedication	8 307 288 A	Entire document	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce Civil Nuclear SAS would be harmed by disclosure of its quality procedure for dedicating hardware and software, which is RRCN's commercially-sensitive interpretation of publicly-available guidance on dedication. This procedure yields an important competitive advantage for Rolls-Royce Civil Nuclear SAS.	Entire document (see Note 3)
Dedication Plan for the Generic SPINLINE 3 Digital Safety I&C Platform	3 010 794 A	Table A-1 in Section 8 (Appendix A - Compliance with the Dedication Process Defined in EPRI TR-106439)	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce Civil Nuclear SAS would be harmed by disclosure of details on the specific actions and acceptance criteria it has applied to dedicating the SPINLINE 3 digital safety I&C platform. These commercially sensitive matters are appropriate for disclosure only to NRC and customers.	Table A-1 in Section 8

Notes:

- (1) In documents with significant non-proprietary content, the specific parts of the documents that contain proprietary information are denoted by double brackets (“[[]]”) at the beginning and end of each proprietary segment. In the non-proprietary version of the document, the information within the brackets is removed.
- (2) As required in IN 2009-07, documents containing proprietary information are marked with the word “Proprietary” at the top of the first page of the document and at the top of each page containing such information.
- (3) As noted in IN 2009-07, in instances in which a nonproprietary version would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted.