



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 and 2)
SPINLINE 3 Digital Safety I&C Platform - Overview of the Equipment Qualification	None	Slides 11, 21 - 24	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 commercially sensitive schedule for qualification testing (Slide 11). Rolls-Royce Civil Nuclear SAS would be harmed by disclosure of the proprietary detailed design of the Qualification Test System (QTS, Slides 21 – 24), which reveals characteristics of SPINLINE 3 systems that may be of value to competitors.	Slides 11, 21 - 24
SPINLINE 3 Digital Safety I&C Platform - Software Components, Software Tools, Software Development Process	None	Slides 18 – 28, 31 – 36, 38 - 41	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 its proprietary software processes, including use of specific tools, which underpin the integrity of SPINLINE 3 software. These processes yield an important competitive advantage for Rolls-Royce Civil Nuclear SAS.	Slides 18 – 28, 31 – 36, 38 - 41
SPINLINE 3 Digital Safety I&C Platform – NERVIA Network, Testability	None	Slides 4 – 18, 21, 25 - 33	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 operation of the digital communications and testability aspects of the SPINLINE 3 digital safety I&C platform. These features are	Slides 4 – 18, 21, 25 - 33

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 and 2)
				keys to the performance and reliable operation of systems based on SPINLINE technology, which are important competitive advantages for Rolls-Royce Civil Nuclear SAS.	

Notes:

- (1) In the presentation packages with proprietary content, the specific pages containing proprietary information are marked "Proprietary" at the bottom of each page frame. In the non-proprietary version of the document, the information on each proprietary page is removed and the affected page is re-marked "Non-proprietary" at the bottom of the page frame.
- (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.