



January 8, 2010  
NRC:10:004

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

**Response to Sixth Request for Additional Information Regarding ANP-10278P, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report" (TAC No. MD4978)**

Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10278P Revision 0, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report'," NRC:07:010, March 26, 2007.

Ref. 2: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Sixth Request for Additional Information Regarding ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report,' (TAC No. MD4978)," October 5, 2009.

AREVA NP Inc. (AREVA NP) requested the NRC's review and approval of topical report ANP-10278P, Revision 0, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report" in Reference 1. In this regard, AREVA NP provided additional information to the NRC in response to a number of requests for additional information. The NRC made a sixth request for additional information (RAI) in Reference 2. The response to the Reference 2 RAI is enclosed with this letter, ANP-10278Q7P, "Response to Sixth Request for Additional information – ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report' (TAC NO. MD4978)."

AREVA NP has revised ANP-10278P to incorporate changes associated with the enclosed RAI responses. Accordingly, Revision 1 of ANP-10278P is enclosed.

Corresponding changes have also been made to ANP-10288P, "U.S. EPR Post-LOCA Boron Precipitation and Boron Dilution Technical Report," Revision 0. Accordingly, Revision 1 of ANP-10288P is enclosed.

Also enclosed are corresponding revisions to the sections of the U.S. EPR Final Safety Analysis Report (FSAR) based on the methodology presented in ANP-10278P.

As noted, AREVA NP considers some of the material contained in the enclosures 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 documents are provided on the enclosed CDs.

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

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FORM 2709A-1 (4/1/2009)

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If you have any questions related to this submittal, please contact Ms. Sandra M. Sloan, Regulatory Affairs Manager for New Plants, by telephone at 434-832-2369 or by e-mail to [sandra.sloan@areva.com](mailto:sandra.sloan@areva.com).

Sincerely,

*Sandra M. Sloan for*

Ronnie L. Gardner, Manager  
Corporate Regulatory Affairs  
AREVA NP Inc.

Enclosures:

1. ANP-10278Q7P, "Response to Sixth Request for Additional Information – ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report' (TAC NO. MD4978)."
2. ANP-10278Q7NP, "Response to Sixth Request for Additional Information – ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report' (TAC NO. MD4978)."
3. ANP-10278P, Revision 1, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report."
4. ANP-10278NP, Revision 1, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report."
5. ANP-10288P, Revision 1, "U.S. EPR Post-LOCA Boron Precipitation and Boron Dilution Technical Report."
6. ANP-10288NP, Revision 1, "U.S. EPR Post-LOCA Boron Precipitation and Boron Dilution Technical Report."
7. Corresponding revisions to U.S. EPR FSAR.
8. Affidavit.

cc: G. Tesfaye  
Docket No. 52-020

## 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:10:004, "Response to Sixth Request for Additional Information Regarding ANP-10278P, "U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report," 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.

*Jonda M. Pedersen*

SUBSCRIBED before me this *8<sup>th</sup>*  
day of *January*, 2010.

*Kathleen A. Bennett*

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

