PWROG
PWR Owners Group

Program Management Office
4350 Northern Pike
Monroeville, Pennsylvania 15146

Project Number 694
WCAP-16793-NP, Revision 1
51-2500019-000

February 9, 2010

OG-10-46

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-001

Subject: PWR Owners Group
PWROG Response to Request for Additional Information Regarding PWROG Topical Report 51-9102685-000, Revision 0, "GSI-191 FA Test Report for PWROG ," (PA-SEE-0479)

References:

1. "For Information Only – Engineering Information Record 51-9102685-000 (Proprietary) 'GSI-191 FA Test Report for PWROG' (PA-SEE-0479)," OG-09-123, dated March 20, 2009.

2. "PWR Owners Group Submittal of WCAP-16793-NP, Revision 1, 'Evaluation of Long-Term Cooling Considering Particulate, Fibrous and Chemical Debris in the Recirculating' (PA-SEE-0312)," OG-09-163, dated April 22, 2009.

3. NRC Letter, Jonathan Rowley of NRR to Anthony Nowinowski of the PWR Owners Group Program Management Office, "Request for Additional Information RE: Pressurized Water Reactor Owners Group Tropical Report WCAP-16793-NP, Revision 1, 'Evaluation of Long-Term Cooling Considering Particulate, Fibrous and Chemical Debris in the Recirculating Fluid' (TAC No. ME1234)," January 8, 2010. (ADAMS Accession Number: ML093490855.)

In March 2009, the Pressurized Water Reactor Owners Group (PWROG) submitted EIR 51-91-02685-000, Revision 0, "GSI-191 FA Test Report for PWROG," (Reference 1) in support of WCAP-16793-NP, Revision 1.

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NRR

In April 2009, the Pressurized Water Reactor Owners Group submitted WCAP-16793-NP, Revision 1, "Evaluation of Long-Term Cooling Considering Particulate, Fibrous and Chemical Debris in the Recirculating Fluid," for review and acceptance for referencing in regulatory actions (Reference 2). In January 2010, NRC staff provided a formal Request for Additional Information (RAI) (Reference 3) for WCAP-16793-NP, Revision 1. Enclosure 2 to this letter provides the proprietary RAI responses to the questions received in Reference 3.

Enclosures include:

1. One copy of AREVA NP affidavit (Non-proprietary)

2. One copy of RAI Response, AREVA Document 51-2500019-000 (Proprietary)

Correspondence related to this transmittal should be addressed to:

Mr. Robert J. Schomaker
Project Manager
AREVA NP
3315 Old Forest Rd.
Lynchburg VA 24501

If you have any questions, please do not hesitate to contact me at 704-382-8619 or Mr. Robert Schomaker of the Owners Group Program Management Office at 434-832-2917.

Sincerely,

Kenneth J. Nemit for M. Arey

K. Nemit for M. Arey

Melvin L. Arey, Chairman
PWROG Owners Group

Enclosures (2)

MLA:KJN:RJS:rfn

cc: PWROG Management Committee
PWROG Steering Committee
PWROG Systems & Equipment Engineering Subcommittee
PWROG Licensing Subcommittee
J. Rowley, USNRC
M. Scott, USNRC
R. Schomaker, AREVA
G. Wissinger, AREVA

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, 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 EIR, Document Number 51-2500019, Revision 000, entitled "RAI Responses for FA Test 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 have 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.

SUBSCRIBED before me this 8th
day of February 2010.

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/10
Reg. # 7079129

SHERRY L. MCFADEN
Notary Public
Commonwealth of Virginia
7079129
My Commission Expires Oct 31, 2010