



March 4, 2010  
NRC:10:015

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

**Response to U.S. EPR Design Certification Application RAI No. 348**

Ref. 1: E-mail, Getachew Tesfaye (NRC) to Ronda Pederson, et al (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 348 ((4085, 4092), FSAR Ch 18," February 2, 2010.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application (i.e., RAI No.348). The enclosure provides technically correct and complete responses to all 22 questions

The following table indicates the respective pages in the response document that contain AREVA NP's response to the subject questions.

Question #	Start Page	End Page
RAI 348 — 18-90	2	2
RAI 348 — 18-91	3	3
RAI 348 — 18-92	4	5
RAI 348 — 18-93	6	6
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RAI 348 — 18-111	27	27

This concludes the formal AREVA NP response to RAI 348, and there are no questions from this RAI for which AREVA NP has not provided responses.

D077  
NRO

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

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FORM 22709VA-1 (4/1/2009)

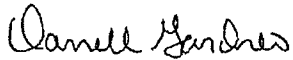
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AREVA NP considers portions of the material contained in the enclosure to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the enclosure to this letter are provided.

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](mailto:sandra.sloan@areva.com).

Sincerely,



*for* 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.

George Russell

SUBSCRIBED before me this 4<sup>th</sup>  
day of March, 2010.

Sherry L. McFaden

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

