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March 19th, 2010

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Policy and Rulemaking
Washington, D.C. 20555-0001

PROJ0731

Attention: Document Control Desk

Subject: Revisions to Responses to RAI Part 3 for HFC-6000 Safety Control (TAC NO. MD8462)

Reference: HFC-6000 Safety Control System

Docket number: 000-00731

Enclosed documents include a document for the revisions to the responses to NRC RAI Part 3 for HFC-6000 Safety Control System Topical Report PP901-000-01 Rev. C and supporting documents. Since some of the documents contain proprietary information, HF Controls is submitting two versions of the documents: proprietary and non-proprietary. HF Controls is requesting the Commission to withhold the information in the proprietary version. The non-proprietary version of the documents is made available for the public. The justification for the withholding is described in the document, "Justification for Proprietary Information Affidavit" in accordance with 10 CFR 2.390. In addition, the marking of the proprietary information and the non-proprietary information within the documents is listed in the document, "Proprietary Information Notice". The following table lists the documents in this submittal:

Document Number	Name	Revision	Proprietary Version
RR901-001-02	Revisions to Responses to NRC RAI Part 3	A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
CR Records (Closed)	CR 2009-0623, -0624, -0625, -0628, -0631		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
DS001-000-75	HFC-6000 CPLD Design Specification	C	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
RR901-000-36	Radiation Exposure Evaluation	A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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For the submittal on March 12th 2010 to NRC, 4 documents were left out from the list in the transmittal letter. These documents are listed in the table below: (No proprietary versions of these documents are submitted.)

Document Number	Name	Revision
RR901-000-31	Traceability Matrix for HFC-6000 product line	F
RR901-000-31, Attachment A	CQ4 Requirement Traceability Matrix	A
RR901-000-31, Attachment B	Equation Interpreter Requirement Traceability Matrix	B
RR901-000-31, Attachment C	IO Card Requirement Traceability Matrix	A

Sincerely,


Ivan Chow
V&V Team, Manager

Enclosures:

- 1- The hard copies of documents in two versions:
Proprietary and Non-Proprietary
- 2- Justification for Proprietary Information Affidavit
- 3- Proprietary Information Notice
- 4- A CD of the submitted documents in PDF format. The formats have been verified using Adobe 6.0 preflight with preflight profile downloaded from NRC website.

CC: Jonathan Rowley, NRC
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Policy and Rulemaking
Special Projects Branch
MS: O-12D1

A. Hsu, E. Herchenrader, T. Gerardis, HF Controls

Justification for Proprietary Information Affidavit

- (1) My name is Ivan Chow. I am the V&V Team Manager of Doosan HF Controls (HFC) Corporation and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of Doosan-HFC Corporation.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Doosan HFC application for withholding accompanying this affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Doosan HFC in designating information as trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (a) The information sought to be withheld from public disclosure is owned and has been held in confidence by Doosan HFC Corporation.
 - (b) The information is of a type customarily held in confidence by Doosan HFC and not customarily disclosed to the public. Doosan HFC has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, uses a uniform method to determine when and whether to hold certain types of information in confidence. The application of our method and the substance of constitute Doosan HFC's policy and provide the rational basis required.

Under the Doosan HFC method, information is held in confidence if it falls in one or more of several types of information, the release of which might result in the loss of an existing or potential competitive advantage as follows:

- ❖ Its use by a competitor would reduce his expenditure of resources and improve his competitive position in the design, manufacture, installation, assurance of quality, or licensing a digital based I&C system.
- ❖ It reveals cost or price information, production capacities, budget levels, or commercial strategies of Doosan HFC, its customers or suppliers.

- ❖ It reveals aspects of past, present or future Doosan HFC or customer funded development plans and programs of potential commercial value to Doosan HFC.
- ❖ It contains patentable ideas, for which patent protection may be desirable.

For this affidavit, all of the information marked proprietary is because its use by a competitor would reduce his expenditure of resources and improve his competitive position in the design, manufacture, installation, assurance of quality, or licensing a digital based I&C system (type one above). This leads to a Doosan HFC need to restrict certain commercial information from the public to prevent its use by competitors and creating a commercial advantage for them to the detriment of Doosan HFC.

The development of the HFC-6000 system design is the result of many years of development by uniquely experienced personnel in an intensive effort along with the expenditure of a considerable sum of money. In order for competitors to duplicate the Doosan HFC design and applicable information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience would have to be expended for the development of a digital design to equal the HFC-6000 system design.

There are sound Doosan HFC policy reasons behind the Doosan HFC proprietary designation system which include the following:

- a) The Use of such information by Doosan HFC gives Doosan HFC a competitive advantage over its competitors. It is therefore, withheld from disclosure to protect the Doosan HFC competitive position.
- b) It is information which is marketable in many ways. The extent to which such information is available to competitors diminishes the Doosan HFC ability to sell products involving the use of the information.
- c) Use by our competitors would put Doosan HFC at a competitive disadvantage by reducing their expenditure or resources at Doosan HFC expense.
- d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Doosan HFC of a competitive advantage.
- e) Unrestricted disclosure would jeopardize the position of Doosan HFC in the world market such as South Korea, and thereby give a market advantage to the competition in those countries.

- (5) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR 2.390, it is to be received in confidence by the Commission.
- (6) Available information has not been previously employed in the same original. The information sought to be protected is not available in public sources or manner or method to the best of our knowledge and belief.
- (7) The proprietary information sought to be withheld in the submittal is that which is appropriately marked by deletion, with brackets in some documents, in the following HFC non-proprietary documents:

Document Number	Name	Revision
RR901-001-02	Revisions to Responses to NRC RAI Part 3	A
CR Records (Closed)	CR 2009-0623, -0624, -0625, -0628, -0631	
DS001-000-75	HFC-SBC06 CPLD Design Specification	C
RR901-000-36	Radiation Exposure Evaluation	A

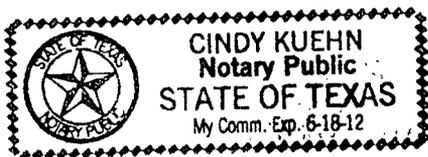
AFFIDAVIT, STATE OF TEXAS, COUNTY OF DALLAS

Before me, the undersigned authority, personally appeared Ivan Chow, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Doosan HF Controls Corporation (HFC) and the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information and belief:

Ivan Chow
Ivan Chow

Sworn to and subscribed
Before me this 19th day
of March, 2010

Notary Public



Proprietary Information Notice

On March 19th 2010, Doosan HF Controls transmitted the following documents in both proprietary and non-proprietary formats:

Document Number	Name	Revision
RR901-001-02	Revisions to Responses to NRC RAI Part 3	A
CR Records (Closed)	CR 2009-0623, -0624, -0625, -0628, -0631	
DS001-000-75	HFC-SBC06 CPLD Design Specification	C
RR901-000-36	Radiation Exposure Evaluation	A

In order to conform to the requirements of 10 CFR 2.390 concerning the protection of proprietary information submitted to the NRC, proprietary versions of the documents listed above are marked "HFC Proprietary" on the title page and on each subsequent page containing proprietary information. For the corresponding non-proprietary versions, all proprietary information has been deleted, with brackets in some documents, such that only non-proprietary information remains. In addition, the deletion was done in the manner such that the formatting of the documents was preserved so that page numbers, headings and section numbers remain unchanged. Since the basis for deleting the information in all instances is to protect Doosan HFC corporation confidential commercial information; there is no adjacent marking for each deletion as specified in 2.390(b)(1)(a)(i)(B). Instead, in order to facilitate the review process, the locations of the proprietary information in each file are listed in the table below:

Document Number	Locations of the proprietary information as deleted in the non-proprietary version
RR901-001-02	Pages 5-6
CR Records (Closed)	All pages except the cover page
DS901-000-75	Pages 4-14
RR901-000-36	Pages 3-8