



May 10, 2010
NRC:10:046

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

Submittal of U.S. EPR Implementation Plan for the Integration of Human Reliability Analysis (HRA) into the Human Factors Engineering (HFE) Program 118-9038835-003, U.S. EPR Design Certification Application RAI No. 328, Supplement 6

Ref. 1: E-mail, Martin Bryan (AREVA NP Inc.) to Getachew Tesfaye (NRC), "U.S. EPR Design Certification Application RAI No. 328 Supplement 4, FSAR Ch 18," April 16, 2010.

In Reference 1, AREVA NP Inc. (AREVA NP) responded with a new date of May 10, 2010 for the submittal of "U.S. EPR Implementation Plan for the Integration of Human Reliability Analysis (HRA) into the Human Factors Engineering (HFE) Program 118-9038835-003" related to Questions 18-55 and 18-56.

Enclosed with this letter is the document, "U.S. EPR Implementation Plan for the Integration of Human Reliability Analysis (HRA) into the Human Factors Engineering (HFE) Program 118-9038835-003," as committed in the responses to RAI 328 Supplement 4, Questions 18-55 and 18-56.

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.

Sincerely,

Sandra M. Sloan

Sandra M. Sloan, Manager
New Plants Regulatory Affairs
AREVA NP Inc.

Enclosures

cc: G. Tesfaye
Docket No. 52-020

Prop + non prop enclosures

*D077
NRC*

AREVA NP INC.
An AREVA and Siemens company

contain ECI

3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935
Tel: (434) 832-3000 Fax: (434) 832-3840

*Enclosures will not
be added*

FORM 22709VA-1 (4/1/2006)

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
)
CITY OF LYNCHBURG) ss.

1. My name is George L. Pannell. 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 information contained in the document, "U.S. EPR Implementation Plan for the Integration of Human Reliability Analysis (HRA) into the Human Factors Engineering (HFE) Program 118-9038835-003" 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 this Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c) and 6(d) 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 Pannell

SUBSCRIBED before me on this 7th
day of May, 2010.

Sherry L. McFaden

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

