



May 6, 2010
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Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Submission of U.S. EPR Human Factors Verification and Validation Implementation Plan 118-9046087, U.S. EPR Design Certification Application RAI No. 322, Supplement 6

Ref. 1: E-mail, Martin Bryan (AREVA NP Inc.) to Getachew Tesfaye (NRC), "U.S. EPR Design Certification Application RAI No. 322 Supplement 5 (3922, 3907), FSAR Ch 18," April 16, 2010.

In Reference 1, AREVA NP responded to Question 18-48 in RAI 322 supplement 5. Noted in the response, a schedule of May 6, 2010 was provided for the submittal of "U.S. EPR Human Factors Verification and Validation Implementation Plan 118-9046087."

Enclosed with this letter is the document, "U.S. EPR Human Factors Verification and Validation Implementation Plan 118-9046087," as committed in the response to RAI 322 Supplement 5, Question 18-48 as well as in the responses to RAI 328 questions 18-62 and 18-63.

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,

A handwritten signature in cursive script that reads "Sandra M. Sloan".

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

Enclosures

cc: G. Tesfaye
Docket No. 52-020

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KRW

AREVA NP INC.
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FORM 22709VA-1 (4/1/2006)

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 Pennell

SUBSCRIBED before me on this 4th
day of May, 2010.

Sherry L. McFaden

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

