



June 17, 2010
NRC:10:057

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

Review of ANP-10303P, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report," (TAC NO. ME1503)

Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10303P, 'SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report'," NRC:09:063, June 11, 2009.

Ref. 2: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Review of ANP-10303P, 'SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report (TAC NO. ME1503)'," NRC:10:001, January 4, 2010.

AREVA NP Inc. (AREVA NP) submitted ANP-10303P, Revision 0, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report," for review and approval in Reference 1.

The NRC conducted an audit in Alpharetta, GA. The audit was performed to provide additional support for the safety evaluation for ANP-10303P. The audit plan stated that one of the objectives of the audit was to evaluate the usage of the Simulation Validation Test Tool (SIVAT) in conjunction with the verification and validation processes that are being used to qualify safety related applications for use in nuclear power plants. A second objective of the audit was an evaluation of the software development and configuration management control processes that were used for the SIVAT software development.

AREVA NP made three presentations during the audit to address the first audit objective. The NRC also reviewed an example document that illustrated how software testing with SIVAT would be conducted. The NRC requested that this material be submitted on the docket.

The following documents are provided in an enclosure to this letter:

- AREVA NP Presentation entitled "Integration of SIVAT into Requirements Traceability Matrix" – Proprietary Version
- AREVA NP Presentation entitled "Simulation Software: SIVAT" – Proprietary Version
- AREVA NP Presentation entitled "TELEPERM XS Perspectives on Limitations of SIVAT Testing" – Proprietary Version
- AREVA NP Presentation entitled "Integration of SIVAT into Requirements Traceability Matrix" – Nonproprietary Version
- AREVA NP Presentation entitled "Simulation Software: SIVAT" – Nonproprietary Version

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AREVA NP INC.

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Add H. Cruz
to ERTIOS

- AREVA NP Presentation entitled "TELEPERM XS Perspectives on Limitations of SIVAT Testing" – Nonproprietary Version
- AREVA NP document 51-9003307-006, Oconee Nuclear Station, Unit 1, 2, and 3 RPS/ESFAS Controls Upgrade Simulation Based Validation Tool (SIVAT) Test Plan

AREVA NP considers some of the material contained in the enclosed documents 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 documents are provided. A nonproprietary version of AREVA NP document 51-9003307-006 is not provided based on the guidance in Information Notice 2009-07.

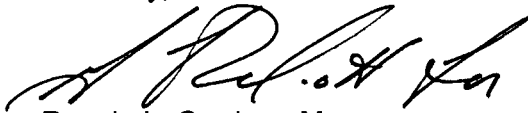
The NRC also reviewed the following documents as part of the second audit objective:

- Rahmenlastenheft: TXS-Simulator (KWU NLL4/98/042)
(translated title: General requirements specification: TXS simulator)
- Lastenheft SIMM (KWU NLL4/98/068)
(translated title: Requirements specification: SIMM)
- TXS-Pflichtenheft, Version 01.21: Generator CATS-SDE für die TXS-Simulationsumgebung (KWU NLLZ ST/99/023b)
(translated title: TXS design specification, version 01.21: Generator CATS-SDE for the TXS simulation environment)
- Lastenheft: Simulation Development Environment (KWU NLL4/98/049)
(translated title: Requirements Specification: Simulation Development Environment)

The NRC requested that additional portions of these documents be translated and added to AREVA NP document NLTC-G/2009/en/0069 A, "TELEPERM XS Simulation tools - translation of selected chapters from requirements and design specification documents from the initial development," which was previously provided by Reference 2. AREVA NP will provide this information by July 23, 2010.

If you have any questions related to this submittal, please contact Mr. Mark Burzynski, Manager, Product Licensing. He may be reached by telephone at 434-832-4695 or by e-mail at Mark.Burzynski@areva.com.

Sincerely,



Ronnie L. Gardner, Manager
Corporate Regulatory Affairs
AREVA NP Inc.

Enclosures

cc: H. D. Cruz
R. Stattel
Project 728

AFFIDAVIT

STATE OF GEORGIA)
)
COUNTY OF FULTON) ss.

Mark J. Burzynski personally appeared before me and took an oath that the following is true and correct:

1. My name is Mark J. Burzynski. 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 provided to the NRC in support of NRC review of AREVA NP Topical Report ANP-10303P, Revision 0, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report." The following AREVA NP documents are provided and referred to herein as the "Documents."

- AREVA NP document 51-9003307-006, Oconee Nuclear Station, Unit 1, 2, and 3 RPS/ESFAS Controls Upgrade Simulation Based Validation Tool (SIVAT) Test Plan
- AREVA NP Presentation entitled "Integration of SIVAT into Requirements Traceability Matrix"
- AREVA NP Presentation entitled "Simulation Software: SIVAT"
- AREVA NP Presentation entitled "TELEPERM XS Perspectives on Limitations of SIVAT Testing"

Information contained in these Documents 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. These Documents contain 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 these Documents as proprietary and confidential.

5. These Documents have been made available to the U S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents 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 these Documents is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c) and 6(d) above.

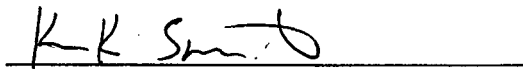
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited 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.


(Signature of Affiant)

Sworn to (or affirmed) before me on this 10th day of JUNE, 2010.


(Signature of Notary)

HENDRICK SMITH
NOTARY PUBLIC, CHEROKEE COUNTY, GEORGIA
MY COMM. EXPIRES 12/15/2013

Notary Public, State of Georgia