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NRC:10:060

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

Commitment to Provide Closure Plans for U.S. EPR Instrumentation and Control Communications Independence Issues

AREVA NP Inc. (AREVA NP) met with NRC staff members on June 25, 2010, to discuss communications independence in U.S. EPR instrumentation and control (I&C) systems. During the meeting, the NRC staff described remaining concerns regarding communications independence in the U.S. EPR I&C design as described in Chapter 7 of the U.S. EPR Final Safety Analysis Report (FSAR) and associated reports incorporated by reference in the FSAR. As understood by AREVA NP based on information provided by NRC staff on June 25, the remaining areas of concern are:

1. Complexity of design
2. Data communication between safety divisions
 - a. Between Safety Information and Control System (SICS) divisions
 - b. Between Safety Automation System (SAS) divisions
 - c. Between Protection System (PS) divisions
3. Continuous connection between non-safety Service Unit (SU) and safety divisions
4. Data communication from non-safety Process Information and Control System (PICS) to safety divisions

At the meeting, AREVA NP outlined proposed closure plans for each of these items, including proposed design changes. AREVA NP will take into account feedback provided by the NRC on June 25 and provide formal closure plans for items 1, 2a, and 4, by July 28, 2010. These closure plans will identify the planned design changes and the impacted licensing documents, such as FSAR sections and topical and technical reports. AREVA NP will also provide a timeline indicating the submittal of revised licensing documents as well as appropriate opportunities for interaction with NRC staff, such as meetings or audits. Subsequent to submittal of the closure plans, AREVA NP will request a public meeting with NRC staff to confirm the viability of the closure plans.

In those cases in which AREVA NP proposes to maintain the current design for enhanced safety and reliability (items 2b and 2c), or to maintain fundamental features of AREVA NP TXS technology (item 3), AREVA NP requests an opportunity to meet again with the NRC staff to present more detailed justification for the current design and describe potential alternatives. AREVA NP acknowledges that resolution of these items may involve submittal of information to provide additional justification for the design or to propose an alternative. AREVA NP requests a meeting with the NRC staff in July 2010 to discuss item 3, and a meeting with the NRC staff in August to discuss items 2b and 2c. AREVA NP will evaluate feedback provided by NRC and provide formal closure plans for these items within 2 weeks of each of these meetings.

AREVA NP INC.
An AREVA and Siemens company

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AREVA NP will keep the NRC staff informed throughout the preparation and submittal of the revised documentation, including providing draft information for discussion prior to submittal of final information. AREVA NP expects that through frequent, interactive communications, submittals can be provided which support a predictable and timely review by NRC staff.

AREVA NP acknowledges NRC concerns in the area of I&C communications independence and is committed to making resolution of these concerns a priority activity. It is AREVA NP's expectation that adherence to the agreed-upon closure plans, timely action and effective communication will ensure that the impact on the design certification review is minimized. To achieve this objective, AREVA NP requests continued, focused NRC management oversight and AREVA NP will continue active communication with all levels of NRC staff to keep them informed.

If you have any questions related to this information, please contact Ms. Sandra M. Sloan by telephone at (434) 832-2369 or by e-mail at sandra.sloan@areva.com.

Sincerely,



Sliva Thomas E. Sliva, Vice President
New Plant Projects
AREVA NP Inc.

Enclosures

cc: G. Holahan
G. Tesfaye
Docket 52-020