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

Response to U. S. EPR Design Certification RAI No. 408, FSAR Ch. 18, Supplement 2

Ref. 1: E-mail, Martin Bryan (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 408, FSAR Ch. 18," July 14, 2010.

Ref. 2: E-mail, Martin Bryan (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 408 Supplement 1 FSAR Ch. 18," August 5, 2010.

In reference 1, AREVA indicated that the remaining 4 questions for RAI 408 would be addressed by updating the "U.S. EPR Task Analysis Implementation Plan."

In Reference 2, AREVA provided a response to request for additional information RAI 408 supplement 1 regarding the U.S. EPR design certification application which provided a schedule date of August 31, 2010 for completion of the remaining 4 questions in RAI 408.

The revised version of the "U.S. EPR Task Analysis Implementation Plan" is enclosed with this letter to address RAI 408 Questions 18-167, 18-168, 18-169, 18-170 as committed in reference 2.

AREVA NP considers the portions of enclosed document listed above to be proprietary; therefore, a proprietary and non-proprietary version is enclosed. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

This concludes the formal AREVA NP response to RAI 408, and there are no questions from this RAI for which AREVA NP has not provided responses.

Sincerely,

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

Enclosure

cc: G. Tesfaye
Docket No. 52-020

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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), 6(d), and 6(e) 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.



SUBSCRIBED before me this 26th
day of August, 2010.



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

