



September 10, 2010
NRC:10:083

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

**Response to a Request for Additional Information Regarding ANP-10307P, Revision 0,
"AREVA MCPR Safety Limit Methodology for Boiling Water Reactors" (TAC No. ME2914)**

Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10307P, Revision 0, 'AREVA MCPR Safety Limit Methodology for Boiling Water Reactors'," NRC:09:104, October 14, 2009.

Ref. 2: Letter, Holly Cruz (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Request for Additional Information Re: AREVA NP Inc. (AREVA) Topical Report (TR) ANP-10307P, Revision 0, 'AREVA MCPR [Minimum Critical Power Ratio] Safety Limit Methodology for Boiling Water Reactors,' (TAC No. ME2914)" August 13, 2010.

AREVA NP Inc. (AREVA NP) requested the NRC's review and approval of the topical report ANP-10307P, Revision 0, "AREVA MCPR Safety Limit Methodology for Boiling Water Reactors" in Reference 1. The NRC provided a request for additional information (RAI) regarding this topical report in Reference 2. The response to this RAI is enclosed with this letter as an attachment.

AREVA NP considers some of the material contained in the attachment 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 attached RAI responses are provided.

If you have any questions related to this submittal, please contact Mr. Alan B. Meginnis, Product Licensing Manager by telephone at 509-375-8266 or by e-mail at alan.meginnis@areva.com.

Sincerely,

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

Enclosures

cc: H. D. Cruz
Project 728

AREVA NP INC.

An AREVA and Siemens company

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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 the Document is considered proprietary for the reasons set forth in paragraphs 6(b), 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 have 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.

Alan B. Meg...

SUBSCRIBED before me this 9th
day of September, 2010.

Susan K. McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/10/12

