Rolls-Royce Civil Nuclear SAS
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Affidavit

In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," Rolls-Royce requests withholding from public disclosure of the documents listed in Table 1, which is attached to this affidavit. As required by 10 CFR 2.390, RRCN has included in Table 1 the following information:

- Identity of the document or part sought to be withheld;
- Declaration of the basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a);
- Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public; and
- Locations in the documents of all information sought to be withheld.

As required in § 2.390(b)(4); Rolls-Royce wishes to note that the request for withholding from public disclosure applies to pages that contain commercially sensitive information that Rolls-Royce normally discloses only under a Non-Disclosure Agreement (NDA). This commercially sensitive information is not available in public sources and is the type of information customarily held in confidence by Rolls-Royce and our competitors. Rolls-Royce is transmitting this information to NRC in confidence.

As noted in Table 1, release of this information in a public forum could cause harm to Rolls-Royce by revealing trade secrets and/or commercially sensitive design and operational details and technical processes related to designing, building, and/or operating a ***SPINLINE 3*** digital safety instrumentation and control system.

As Rolls-Royce Civil Nuclear SAS Deputy Technical Director, I am responsible for reviewing the information sought to be withheld, and I am authorized to apply for its withholding on behalf of Rolls-Royce.

Best regards,

Jean-Pierre Burel
Deputy Technical Director
Rolls-Royce Civil Nuclear SAS

31 January 2011

Vu pour légalisation de la signature
de Mr BUREL JEAN PIERRE
apposée ci-contre,

Meylan, le 31 JAN. 2011
P/Le Maire l'Agent délégué

MAIRIE DE MEYLAN (Isère)

CARARI Michèle

Table 1. Documents requested for withholding from public disclosure

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld (Notes 1, 2 and 3)
Licensing Topical Report (LTR)	3 008 503 C	Portions of Chapters 4, 5, 6, Appendix A and Appendix B, as marked by brackets [[ ]].	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of the identified commercially sensitive information, which is of value to a competitor because it would enable them to make direct comparisons between aspects of their safety I&C platform and life cycle processes and the corresponding details for ***SPINLINE 3.*** Chapter 4: Rolls-Royce would be harmed by disclosure of commercially sensitive details of how the generic hardware and software components of a ***SPINLINE 3*** system work, and how functions such as data communications and automated testing are implemented. This would be of value to a competitor in understanding specific competitive design and operational characteristics of ***SPINLINE 3*** systems.	In Chapter 4: portions of Section 4.2.4.1, 4.2.4.2, 4.3.2.3, 4.3.4.1, 4.3.4.2, 4.3.4.3, 4.3.4.4, 4.3.4.5, 4.3.4.6, 4.3.4.7, 4.3.4.8, 4.4.3.4, 4.4.3.5, 4.4.3.6, 4.4.4.3, 4.5.2.1, 4.5.3, 4.5.4.2, 4.5.4.3, 4.5.5.2, 4.5.6, 4.5.7, 4.6.5, 4.6.7, 4.6.8.1, 4.6.8.2.1, 4.6.8.2.2, 4.6.8.2.3, 4.6.8.3, 4.6.8.4, and 4.6.9.1, as marked by brackets [[ ]].

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld (Notes 1, 2 and 3)
				Chapter 5: Rolls-Royce would be harmed by disclosure of the identified commercially sensitive information, which is of value to a competitor because it defines the specific qualification envelope of the ***SPINLINE** 3* generic platform. This would enable competitors to make direct comparisons between the qualification envelopes for their safety I&C platform and the corresponding details for ***SPINLINE 3*** Chapter 6: Rolls-Royce would be harmed by disclosure of its proprietary technical process for implementing safety software life cycle management. These processes underpin the integrity of ***SPINLINE 3*** software, which is an important competitive advantage for Rolls-Royce. Appendix A. The compliance tables provide certain proprietary details on design, operational and software life cycle process characteristics. Rolls-Royce would be harmed by disclosure of these proprietary details, which would	In Chapter 5: Columns in Tables 5.1-1 and 5.2-1, as marked by brackets [[ ]]. In Chapter 6: portions of Sections 6.2.2.8, 6.2.5, 6.2.10, Figure 6.4-1, and portions of Section 6.4.5, as marked by brackets [[ ]]: In Appendix A, portions of compliance columns in the following tables, as marked by

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld (Notes 1, 2 and 3)
				be of value to a competitor in understanding specific competitive design and operational characteristics of ***SPINLINE 3*** systems and the life cycle processes that underpin the integrity of ***SPINLINE 3*** software. Appendix B: Rolls-Royce would be harmed by disclosure of commercially sensitive design and operational characteristics of ***SPINLINE 3*** generic hardware components. This would be of value to a competitor in understanding specific competitive design and operational characteristics of ***SPINLINE 3*** systems.	brackets [[ ]]: Table 3.6-1, Table 3.7-1, Table 3.8-1, Table 3.8-2, and Table 3.10-1 In Appendix B: all data sheets
Software Configuration Management Plan for ***SPINLINE 3*** Software Sub-assemblies Managed by CM Tool	1 208 878 E	Entire document (French text + English text)	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of its proprietary technical process for implementing safety software configuration management. This processes underpins the integrity of ***SPINLINE 3*** software, which is an important competitive advantage for Rolls-Royce.	Entire document (see Note 3).

Notes:

(1) In documents with significant non-proprietary content, the specific parts of the documents that contain proprietary information are denoted by double brackets ("[[ ]]") at the beginning and end of each proprietary segment. In the non-proprietary version of the document, the information within the brackets is removed.

(2) As required in IN 2009-07, documents containing proprietary information are marked with the word "Proprietary" at the top of the first page of the document and at the top of each page containing such information.

(3) As noted in IN 2009-07, in instances in which a nonproprietary version would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted.