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, Rolls-Royce 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

25 February 2011

Vu pour la légalisation de la signature
de M. ̄ BUREL Jean-Pierre
apposée ci-contre.

Meylan, le .... 2 5 FEV. 2011
 ̄ ̄ Maire l'Agent délégué,

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 and 2)
Software document verification process	1 207 947 E			Rolls-Royce would be harmed by disclosure of aspects of its proprietary technical processes for safety software development and verification and validation. These processes underpin the integrity of *SPINLINE 3* software, which is an important competitive advantage for Rolls-Royce.	All of Sections 2 to 4 (French text + English text)
SPINLINE 3 2000 Changes Software Development Plan	1 208 645 A	Entire document (see Note 2).	Trade secrets and / or commercial information as per § 2.390(a)(4)		Entire document
SPINLINE 3 2001 Changes Software Development Plan	1 208 908 A				Entire document

Notes:

(1) 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. In proprietary documents, brackets ("[[]]") denote proprietary information. In the proprietary document, the two brackets denoting the end of a proprietary segment of a report may appear one or more pages following the bracket indicating the start of the proprietary segment. In a nonproprietary edition of a proprietary document, the material within the brackets is removed.

(2) 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.