



March 28, 2011
NRC:11:028

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

ANP-10315P, "U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report"

Proposed changes to the instrumentation and controls (I&C) architecture were communicated to the NRC staff in the February 15, 2011 public meeting. The U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report has been developed to incorporate the revised I&C architecture. The new report "U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report" (ANP-10315P), is enclosed with this letter.

AREVA NP has incorporated this report by reference in the U.S. EPR Final Safety Analysis Report (FSAR). The conforming changes to U.S. EPR FSAR will be transmitted to the NRC consistent with the schedule communicated in the February 15, 2011 public meeting. AREVA NP requests that the NRC incorporate the review of this report into the evaluation of the instrumentation and controls design in the safety evaluation report for the U.S. EPR FSAR in a manner consistent with other reports which are incorporated by reference in the U.S. EPR FSAR.

AREVA NP considers some of the material contained in the enclosures 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 attachments are provided on the enclosed CDs.

Sincerely,

A handwritten signature in cursive script that reads "Sandra M. Sloan".

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

Enclosure

cc: G. Tesfaye
Docket No. 52-020

DO77
NRO

A F F I D A V I T

COMMONWEALTH OF VIRGINIA)
) ss.
COUNTY OF CAMPBELL)

1. My name is Sandra M. Sloan. I am Manager, Regulatory Affairs for New Plants, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in, "ANP-10315P, "U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report," and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

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

Sandra M. Sloan

SUBSCRIBED before me this 28th
day of March, 2011.

Kathleen A. Bennett

Kathleen A. Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/2011
Reg. #110864

