



March 29, 2011
NRC:11:031

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

Submittal of ANP-10310P, "Methodology for 100% Combinatorial Testing of the U.S. EPR™ Priority Module Technical Report," Revision 1

Proposed changes to the instrumentation and controls (I&C) architecture were communicated to the NRC staff in the February 15, 2011 public meeting. The "Methodology for 100% Combinatorial Testing of the U.S. EPR™ Priority Module Technical Report" has been revised to incorporate the AREVA NP response to RAI 373 and the revised I&C architecture. The revised report "Methodology for 100% Combinatorial Testing of the U.S. EPR™ Priority Module Technical Report" (ANP-10310P), Revision 1, 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.

If you have any questions related to this information, please contact me by telephone at (434) 832-2369 or by e-mail at sandra.sloan@areva.com.

Sincerely,

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

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

Enclosure

cc: G. Tesfaye
Docket No. 52-020

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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) 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 29th
day of March, 2011.

Kathleen A. Bennett

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

