

Crystal River Nuclear Plant Docket No. 50-302 Operating License No. DPR-72

May 6, 2011 3F0511-02

U.S. Nuclear Regulatory Commission

Attn: Document Control Desk Washington, DC 20555-0001

Subject:

Crystal River Unit 3 – Request for Additional Information Required for the

Development of Confirmatory LOCA and non-LOCA Models for the CR-3

Extended Power Uprate

Reference:

NRC to CR-3 email dated February 17, 2011, "Crystal River, Unit 3 - Pre-EPU RAIs for the Development of Confirmatory LOCA and non-LOCA Models"

Dear Sir:

Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc. hereby provides a response to a request for additional information (RAI) required for the development of confirmatory Loss of Coolant Accident (LOCA) and non-LOCA models for the Crystal River Unit 3 (CR-3) Extended Power Uprate (EPU). This request was forwarded by electronic mail on February 17, 2011.

Attachment B contains proprietary information. AREVA NP Inc. requests the proprietary information be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4). Attachment A provides the Affidavit supporting the request. A non-proprietary version of the documentation is not available. The requested information that is readily available is included in Attachment B. The remainder of the requested information is expected to be submitted when they become available.

This correspondence contains no new regulatory commitments.

If you have any questions regarding this submittal, please contact Mr. Dan Westcott, Superintendent, Licensing and Regulatory Programs at (352) 563-4796.

Sincerely,

Stephen J. Cahill

Director-Engineering-Nuclear Crystal River Nuclear Plant

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SJC/rt

Attachments:

Affidavit for Withholding Proprietary Information from Public Disclosure A.

Response to Request for Additional Information Required for the Development of the Confirmatory LOCA and non-LOCA Models B. (Proprietary)

C. List of Regulatory Commitments

Enclosure:

Request for Additional Information Required for the Development of the Confirmatory LOCA and non-LOCA Models FOR THE CR-3 Extended Power

Uprate (Proprietary) --- CD-ROM

xc:

NRR Project Manager

AWI

# FLORIDA POWER CORPORATION CRYSTAL RIVER UNIT 3

# DOCKET NUMBER 50-302 /LICENSE NUMBER DPR-72 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

## **ATTACHMENT A**

AFFIDAVIT FOR WITHHOLDING PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE

### AFFIDAVIT

COMMONWEALTH OF VIRGINIA	)	SS.
CITY OF LYNCHBURG	)	აა.

- My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA
   NP Inc. (AREVA NP) 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 Engineering Information Records,
  Document Number 51-9060386-003, entitled "CR-3 AIS for Load Rejection/Turbine Trip Event
  at EPU Power Level," dated May 2010 and Document Number 51-9059350-004, entitled, "CR-3
  Extended Power Uprate MSLB Event Analytical Input Summary," dated January 2011 and
  referred to herein as "Documents." Information contained in these Documents 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. These Documents contain 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 these Documents as proprietary and confidential.
- 5. These Documents have been made available to the U.S. Nuclear Regulatory
  Commission in confidence with the request that the information contained in these Documents
  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 these Documents 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 these Documents 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.

SUBSCRIBED before me this 4th

day of WWW/

2011

Sherry L. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA

MY COMMISSION EXPIRES: 10/31/14

Reg. # 7079129

SHERRY L. MCFADEN Notary Public Commonwealth of Virginia 7079129 My Commission Expires Oct 31, 2014

# FLORIDA POWER CORPORATION CRYSTAL RIVER UNIT 3 DOCKET NUMBER 50-302 /LICENSE NUMBER DPR-72 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

# **ATTACHMENT C**

LIST OF REGULATORY COMMITMENTS

# List of Regulatory Commitments

The following table identifies those actions committed to by Florida Power Corporation (FPC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please notify the Superintendent, Licensing and Regulatory Programs of any questions regarding this document or any associated regulatory commitments.

Regulatory Commitments	Due Date/Event
None	