



March 31, 2011
NRC:11:035

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

Closure Plan for Issues Associated with GSI-191 for U.S. EPR Design Certification and Submittal of Revision 3 to Technical Report ANP-10293P, "U.S. EPR™ Design Features to Address GSI-191"

- Ref. 1: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Application for Standard Design Certification of the U.S. EPR (Project No. 733), NRC:07:070, December 11, 2007.
- Ref. 2: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "U.S. EPR Final Safety Analysis Report, Supplement 1," NRC:08:012, February 7, 2008.
- Ref. 3: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "U.S. EPR™ Design Certification Submittal of Revision 1 to Technical Report ANP-10293, 'U.S. EPR Design Features to Address GSI-191'," NRC:10:050, May 19, 2010.
- Ref. 4: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "U.S. EPR Design Certification Submittal of Revision 2 to Technical Report ANP-10293, 'U.S. EPR™ Design Features to Address GSI-191'." NRC:10:102, November 5, 2010.
- Ref. 5: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Closure Plan for Issues Associated with GSI-191 for the U.S. EPR Design Certification," NRC:10:111, December 14, 2010.

On December 11, 2007, AREVA NP Inc. (AREVA NP) requested the NRC's review and approval of its application for design certification of the U.S. EPR (Reference 1). To support the application, AREVA NP provided technical report ANP-10293, Revision 0, "U.S. EPR™ Design Features to Address GSI-191" (Reference 2). References 3 and 4 provided revisions to the technical report to include the results of additional sump strainer performance testing and evaluations and an evaluation methodology for in-vessel downstream effects. In Reference 5, AREVA NP provided the U.S. EPR Design Certification closure plan for issues associated with GSI-191.

In Reference 5, AREVA NP identified three key items remaining to be resolved: the debris source term, the sump strainer/retaining basket design evaluation, and in-vessel (fuel) downstream effects. AREVA NP has completed activities to address the first two items, including extensive testing of the sump strainer/retaining basket configuration, and has provided via separate correspondence the associated responses to Requests for Additional Information (RAIs) on these topics as well as the markups to affected sections of the Final Safety Analysis Report (FSAR). In addition, AREVA NP has revised ANP-10293P to incorporate changes associated with RAIs, including the results of the

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most recent sump strainer performance testing and evaluations. Revision 3 of ANP-10293P is enclosed.

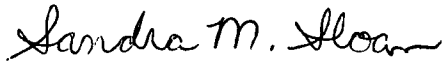
AREVA NP will provide the path forward for resolution of in-vessel, downstream effects by April 30, 2011.

AREVA NP appreciates the engagement of the NRC staff to support interactions identified in the closure plan such as audits and frequent teleconferences.

AREVA NP considers some of the material contained in ANP-10293P, Revision 3 to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the proprietary information from public disclosure. Proprietary and non-proprietary versions of the document are provided on the enclosed CDs.

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

Sincerely,



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

Enclosures

cc: G. Tesfaye
Docket 52-020

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, "Closure Plan for Issues Associated with GSI-191 for U.S. EPR Design Certification and Submittal of Revision 3 to Technical Report ANP-10293P, "U.S. EPRTM Design Features to Address GSI-191," 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 31st
day of March, 2011.

Kathleen A. Bennett

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

