



June 24, 2011  
NRC:11:063

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

### **Pressurized Water Reactor Safety Analysis Licensing Topical Reports**

The U.S. Nuclear Regulatory Commission (NRC), during the review of requests for licensing actions, identified various issues with the plant-specific implementation of some AREVA NP Inc. (AREVA) safety analysis methods. The licensing actions have included safety evaluations for requests to:

- Transition from legacy to current AREVA analytic methods;
- Transition to AREVA-supplied fuel and safety analysis methods from another fuel vendor; and,
- Implement a power uprate.

The affected safety analysis methods are documented in the following licensing topical reports:

- EMF-2103(P)(A), Revision 0, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors," April 2003;
- EMF-2328(P)(A), Revision 0, "PWR Small Break LOCA Evaluation Model, S-RELAP5 Based," March 2001; and,
- EMF-2310(P)(A), Revision 1, "SRP [Standard Review Plan] Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors," May 2004.

To complete the review of the licensing actions, the NRC staff has had to request significant amounts of additional information. This condition has contributed to licensing delays.

As AREVA understands it, the majority of additional information requested by the NRC staff focuses on the technical and regulatory issues discussed in the attachment to this letter.

AREVA seeks to remediate the need for unnecessarily complex reviews and is committed to addressing the questions identified in the RAIs by means of a generic solution. Based on our understanding of the issues, the attachment to this letter identifies AREVA's proposed path forward including a proposed implementation schedule.

In order to ensure effective communications between AREVA and the NRC on this subject, AREVA proposes scheduling periodic meetings.

**AREVA INC.**

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AREVA considers the material contained in the enclosed to be proprietary in full. As required by 10 CFR 2.390(b), an affidavit is attached to support the withholding of the information from public disclosure.

If you have any questions related to this letter, please contact me at 434-832-4937, or by e-mail at [pedro.salas@areva.com](mailto:pedro.salas@areva.com).

Sincerely,



Pedro Salas, Manager  
Corporate Regulatory Affairs  
AREVA NP Inc.

cc: H. D. Cruz  
Project 728

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA    )  
  ) ss.  
CITY OF LYNCHBURG            )

1.       My name is Gayle F. Elliott. I am Manager, Product Licensing, 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 the attachment to the letter from AREVA NP Inc. (P. Salas) to Document Control Desk (NRC) entitled "Pressurized Water Reactor Safety Analysis Licensing Topical Reports," NRC:11:063, dated June 24, 2011 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 this Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

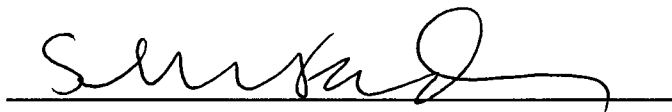
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited 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.

A handwritten signature in black ink, appearing to be 'A. R. H.', written over a horizontal line.

SUBSCRIBED before me this 24<sup>th</sup>  
day of June, 2011.

A handwritten signature in black ink, appearing to be 'Sherry L. McFaden', written over a horizontal line.

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/14  
Reg. # 7079129

