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July 21, 2011 NRC:11:078

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

NRC Request for U.S. EPR Design Certification GOTHIC Input Information

- Ref. 1: E-mail, Getachew Tesfaye (NRC) to Russell D. Wells (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 462 (5258, 5259, 5260), FSAR Ch. 6," January 26, 2011.
- Ref. 2: E-mail, Russell D. Wells (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 462, FSAR Ch. 6," February 25, 2011.
- Ref. 3: E-mail, Russell D. Wells (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 462, FSAR Ch. 6, Supplement 1," April 14, 2011.
- Ref. 4: E-mail, Russell D. Wells (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 462, FSAR Ch. 6, Supplement 2," May 19, 2011.
- Ref. 5: E-mail, Dennis Williford (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 462, FSAR Ch. 6, Supplement 3," June 29, 2011.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application. Reference 2 provided a schedule for technically correct and complete responses to RAI No. 462. References 3 and 4 provided a revised schedule for technically correct and complete responses to the ten questions. Reference 5 provided a technically correct and complete response to Question 06.04-5.

In Question 06.02.03-7, the NRC staff requested that AREVA NP Inc. (AREVA NP) provide the GOTHIC input deck used in the analysis in order for the staff to perform confirmatory analyses. In response, AREVA NP is providing the enclosed CD. AREVA NP considers the information in the enclosed CD to be proprietary in its entirety; therefore, no non-proprietary version is provided. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure.

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If you have any questions related to this submittal, please contact me by telephone at 434-832-2369 or by e-mail to <u>sandra.sloan@areva.com</u>.

Sincerely,

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Sandra M. Sloam

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

Enclosures

cc: G. Tesfaye Docket No. 52-020

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)) ss. CITY OF LYNCHBURG)

1. My name is Sandra M. Sloan. I am Manager, New Plants Regulatory Affairs 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 GOTHIC input information contained on the enclosed CD which supports the response to RAI 462 Question 06.02.03-7 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 paragraph 6(b) and (d) 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 $\mathcal{U}^{\mathcal{A}}$

day of <u>JU v</u> 2011.

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Sherry L McFaden NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA MY COMMISSION EXPIRES: 10/31/2014 Registration # 7079129

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