

September 14, 2011

Mr. Pedro Salas, Manager  
Corporate Regulatory Affairs  
AREVA NP Inc.  
3315 Old Forest Road  
P.O. Box 10395  
Lynchburg, VA 24506-0935

SUBJECT: AREVA PRESSURIZED WATER REACTOR SAFETY ANALYSIS METHODS

During recent licensing reviews, the NRC staff has identified various issues with the safety analysis methods described in the following AREVA NP Licensing Topical Reports:

- EMF-2103(P)(A), Revision 0, "Realistic Large Break Loss of Coolant Accident (LOCA) Methodology for Pressurized Water Reactors [(PWRs)]," 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.

By letter dated June 24, 2011, you informed the NRC staff of your intention to develop a generic resolution that would remediate unnecessarily complex reviews by means of a generic solution to these issues. A proprietary enclosure to your letter identified the problematic areas with each safety analysis method and provided additional detail regarding your proposed resolutions to ensure review stability for licensing action requests submitted to the NRC that are based on the above methodologies.

We have reviewed the information contained in your June 24, 2011, letter and believe that your recovery plan may adequately address the recurring issues that we had previously resolved through our plant-specific licensing reviews. We understand that your plan will incorporate three major elements:

1. For near-term, plant-specific licensing requests, AREVA proposes to use modified safety analysis methods that address the recurring issues identified by the staff.
2. As AREVA develops a long-term, generic resolution, you have proposed to conduct periodic meetings between AREVA and the staff to discuss progress.
3. Once final, generic resolutions have been developed, AREVA proposes to supplement or revise its licensing topical reports to include additional information about its modified safety analysis methods.

At the time that you submitted your letter, we had been evaluating the overall generic implications of the recurring issues that we had identified and resolved during our plant-specific review activities. We were contemplating issuing a generic communication to describe the overall regulatory and safety significance associated with possible uses of your safety analysis methods.

We understand that you have assessed the regulatory and safety significance of the recurring issues identified in your June 24, 2011, letter under the auspices of Part 21 to Title 10 of the *US Code of Federal Regulations*, "Reporting of Defects and Non-Compliances," and intend to submit a letter summarizing the results of that assessment. Based on this consideration, we have determined that there is no need to issue a generic communication at this time.

If you have any questions regarding this subject, please contact Anthony Ulses at 301-415-8539, [anthony.ulsesh@nrc.gov](mailto:anthony.ulsesh@nrc.gov) or Anthony Mendiola 301-415-1054, [anthony.mendiola@nrc.gov](mailto:anthony.mendiola@nrc.gov).

Sincerely,

**/RA/**

Timothy J. McGinty, Director  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

At the time that you submitted your letter, the NRC staff had been evaluating the overall generic implications of the recurring issues that we had identified and resolved during our plant-specific review activities. We were contemplating issuing a Regulatory Issue Summary to describe the overall regulatory and safety significance associated with the use of your safety analysis methods.

Based on the recurring issues identified in your June 24, 2011, letter, we have assessed the regulatory and safety significance for each domestic NRC licensee that currently uses AREVA PWR safety analysis methods. We determined that the recurring issues do not cause any safety concerns, and have therefore decided that there is no need to issue a generic communication at this time. A summary of our assessment is enclosed.

If you have any questions regarding this subject, please contact Anthony Ulses at 301-415-8539, [anthony.ulses@nrc.gov](mailto:anthony.ulses@nrc.gov) or Anthony Mendiola 301-415-1054, [anthony.mendiola@nrc.gov](mailto:anthony.mendiola@nrc.gov).

Sincerely,

*/RA/*

Timothy J. McGinty, Director  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

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