



December 16, 2010
NRC:10:112

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

Submittal of Revised U.S. EPR Human Factors Implementation Plans

- Ref. 1: Letter, Sandra. M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Response to U.S. EPR Design Certification Application RAI No. 171, Supplement 1" NRC:10:048, March 13, 2009.
- Ref. 2: E-mail, Martin Bryan (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 328, FSAR Ch 18, Supplement 5," April 23, 2010.
- Ref. 3: Letter, Sandra. M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of U.S. EPR Implementation Plan for Functional Requirements Analysis and Functional Allocation 11 8-901 8214-003, U.S. EPR Design Certification Application RAI No. 374, Supplement 1" NRC:10:048, May 17, 2010.
- Ref. 4: Letter, Sandra. M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of U.S. EPR OER Implementation Plan 118-9023868-003" NRC:10:035, April 15, 2010.
- Ref. 5: Letter, Sandra. M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of U.S. EPR Human System Interface Design Implementation Plan, U.S. EPR Design Certification Application RAI No. 350, Supplement 2" NRC:10:043, May 7, 2010.
- Ref. 6: Letter, Sandra. M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of U.S. EPR HFE Design Implementation Plan 118-9047891" NRC:10:033, April 09, 2010.
- Ref. 7: Letter, Sandra. M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Response to U.S. EPR Design Certification RAI No. 408, FSAR Ch, 18, Supplement 2" NRC:10:080, August 31, 2010.
- Ref. 8: Letter, Sandra. M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of U.S. EPR HFE Program Management Plan 118-9110637-001, U.S. EPR Design Certification Application RAI No. 348, Supplement 1" NRC:10:045, May 7, 2010.
- Ref. 9: Letter, Sandra. M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of U.S. EPR Implementation Plan for the Integration of Human Reliability Analysis (HRA) into the Human Factors Engineering (HFE) Program 118-9038835-004, U.S. EPR Design Certification Application RAI No. 440 " NRC:10:107, November 18, 2010.

AREVA NP INC.
An AREVA and Siemens company

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FORM: 22709A-1 (4/1/2008)

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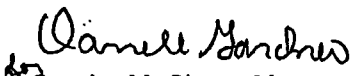
Enclosed with this letter and listed below are revised U.S. EPR Human Factors Implementation Plans incorporated by reference within Chapter 18 of the U.S. EPR FSAR. These revised plans supersede all earlier revisions previously submitted in References 1 through 8. These revised plans support responses to NRC Requests for Additional Information (RAIs) as shown below. An additional revised plan was previously submitted in Reference 9.

AREVA Document	Title	Related RAI
117-9015723-002	Initial Staffing Assumptions for the U.S. EPR	426, Q 18-186
118-9051755-004	U.S. EPR Human Performance Monitoring Implementation Plan	427, Q 18-192
118-9018214-004	U.S. EPR Functional Requirements Analysis and Functional Allocation Implementation Plan	433, Q 18-215
118-9023868-004	U.S. EPR Human Factors Operating Experience Review Implementation Plan	319, Q 18-38
118-9042375-004	U.S. EPR Human System Interface Design Implementation Plan	419, Q 18-172
118-9047891-003	U.S. EPR Human Factors Engineering (HFE) Design Implementation Plan	427, Q 18-195
118-9101668-002	U.S. EPR Task Analysis Implementation Plan	419, Q 18-171
118-9110637-002	U.S. EPR HFE Program Management Plan	348, Q 18-90

AREVA documents 117-9015723-002 and 118-9051755-004 listed above are considered non-proprietary. AREVA NP considers portions of the material contained in the remaining documents listed above and attached to this letter to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the enclosures to this letter are provided.

If you have any questions related to this submittal, please contact 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 No. 52-020

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Sandra M. Sloan. I am Manager, New Builds 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 information contained in the Human Factors Implementation Plans identified in the attachment to this affidavit 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(d) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in these Documents 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.

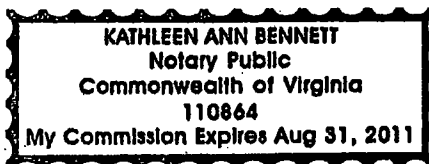
9. The foregoing statements are true and correct to the best of my knowledge,
information, and belief.

Sandra M. Sloan

SUBSCRIBED before me this 15th
day of December 2010.

Kathleen A. Bennett

Kathleen A. Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 08/31/2011
Reg. # 110864



ATTACHMENT

AREVA Document	Title
118-9018214-004	U.S. EPR Functional Requirements Analysis and Functional Allocation Implementation Plan
118-9023868-004	U.S. EPR Human Factors Operating Experience Review Implementation Plan
118-9042375-004	U.S. EPR Human System Interface Design Implementation Plan
118-9047891-003	U.S. EPR Human Factors Engineering (HFE) Design Implementation Plan
118-9101668-002	U.S. EPR Task Analysis Implementation Plan
118-9110637-002	U.S. EPR HFE Program Management Plan