

November 18, 2011

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

Presentation Materials for Pre-Submittal Meeting on PWR Non-LOCA Methodology Supplement

AREVA NP Inc. (AREVA NP) met with the NRC on September 29, 2011 for a presubmittal meeting to discuss the supplement for EMF-2310(P)(A), Revision 1, "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors." Enclosed is the proprietary version of the viewgraphs presented during the meeting.

AREVA NP Inc. considers the material contained in the enclosure 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.

If you have any questions related to this submittal, please contact Ms. Gayle Elliott, Manager, Product Licensing. She may be reached by telephone at 434-832-3347 or by e-mail at Gayle.Elliott@areva.com.

Sincerely.

Pedro Salas, Manager

Corporate Regulatory Affairs

Enclosures

CC:

H.D. Cruz

Project 728

4601

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AFFIDAVIT

COMMONWEALTH OF VIRGINIA)	SS
CITY OF LYNCHBURG)	

- 1. My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA NP Inc. (AREVA NP) 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 final viewgraphs presented to the NRC at a pre-submittal meeting between AREVA NP and the NRC on September 29, 2011 entitled, "EMF-2310 Non-LOCA Supplement," held in Rockville, Md. 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.

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SUBSCRIBED before me this 19th

day of October 2011.

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Sherry L. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA

MY COMMISSION EXPIRES: 10/31/14

Reg. # 7079129

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