



November 18, 2011
NRC:11:113

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

Submittal of Revision 4 to Technical Report ANP-10293P, "U.S. EPR™ Design Features to Address GSI-191"

Ref. 1: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Closure Plan for Issues Associated with GSI-191 for the U.S. EPR Design Certification," NRC:10:111, December 14, 2010.

Ref. 2: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Closure Plan for Issues Associated with GSI-191 for U.S. EPR Design Certification and Submittal of Revision 3 to Technical Report ANP-10293P, 'U.S. EPR™ Design Features to Address GSI-191,'" NRC:11:035, March 31, 2011.

Ref. 3: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Plan for Resolution of GSI-191 In-Vessel Downstream Effects for U.S. EPR Design Certification," NRC:11:037, April 28, 2011.

Ref. 4: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Closure Plan for Resolution of Issues Associated with GSI-191 for U.S. EPR Design Certification," NRC:11:092, August 25, 2011

In Reference 1, AREVA NP Inc. (AREVA NP) provided a closure plan for resolution of issues associated with GSI-191 supporting U.S. EPR design certification. On March 31, 2011, AREVA NP provided a revision to technical report ANP-10293P, "U.S. EPR™ Design Features to Address GSI-191" (Reference 2) and responses to requests for additional information regarding GSI-191 issued prior to March 17, 2011 (with the exception of those related to in-vessel downstream effects). In Reference 2, AREVA NP also committed to providing the path forward for resolution of in-vessel downstream effects by April 30, 2011. In Reference 3, AREVA NP provided a plan for the resolution of issues associated with GSI-191 in-vessel downstream effects supporting U.S. EPR design certification. In Reference 4, AREVA NP provided an updated closure plan for resolution of issues associated with GSI-191 supporting U.S. EPR design certification.

Attachment 1 to this letter contains a list of Requests for Additional Information (RAIs) received to date that are directly related to GSI-191 issues for which AREVA NP will provide a response or an updated response by November 18, 2011. These RAIs pertain to a range of GSI-191 topics, including in-vessel and ex-vessel downstream effects; sump strainer/retaining basket

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design; Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC); and Combined License (COL) items. AREVA NP has provided via separate correspondence the associated RAI responses on these topics as well as the markups to affected sections of the Final Safety Analysis Report (FSAR). In addition, AREVA NP has revised ANP-10293P to incorporate changes associated with RAIs, including the results of fuel assembly downstream effects testing performed in July and August 2011. Revision 4 of ANP-10293P is enclosed.

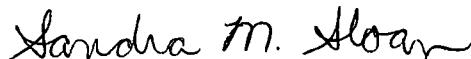
AREVA NP has completed all planned testing associated with the resolution of GSI-191 issues for U.S. EPR design certification and has revised ANP-10293P to incorporate the results of the testing and the evaluations that demonstrate adequate long term core cooling.

AREVA NP considers some of the material contained in ANP-10293P, Revision 4 to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the proprietary information from public disclosure. Proprietary and non-proprietary versions of the document are provided on the enclosed CDs.

AREVA NP is committed to continuing the frequent communications with the NRC staff to efficiently close all GSI-191 related issues.

If you have any questions related to this information, please 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 52-020

Attachment 1

GSI-191 Requests for Additional Information

RAI	Questions
30	15.6.5-4 ¹ , 15.6.5-7 ¹ , 15.6.5-18 ¹ , 15.6.5-19 ¹
111 ²	6.2.2-9 ^{1,3}
191	15.6.5-43, 15.6.5-44, 15.6.5-45, 15.6.5-46, 15.6.5-47, 15.6.5-49
362	15.6.5-56, 15.6.5-57, 15.6.5-58, 15.6.5-59, 15.6.5-60
363	6.2.2-43 ^{1,3} , 6.2.2-44 ^{1,3}
428	15.6.5-81 ^{1,3} , 15.6.5-82 ^{1,3} , 15.6.5-83 ^{1,3} , 15.6.5-84 ^{1,3} , 15.6.5-85, 15.6.5-86, 15.6.5-87, 15.6.5-88, 15.6.5-95
429	6.2.2-67 ¹
457	6.2.2-80 ^{1,3}
480	6.1.2-10, 6.1.2-11, 6.2.2-89, 6.3-17
483	6.2.2-90
488	6.2.2-91, 6.2.2-92, 6.2.2-93, 6.2.2-94, 6.2.2-95, 6.2.2-96, 6.2.2-97, 6.2.2-98, 6.2.2-99
490	6.2.2-100, 6.2.2-101, 6.2.2-102, 6.2.2-103, 6.2.2-104, 6.2.2-105, 6.2.2-106, 6.2.2-107, 6.2.2-108, 6.2.2-109
493	15.6.5-98, 15.6.5-99, 15.6.5-100, 15.6.5-101, 15.6.5-102, 15.6.5-103, 15.6.5-105, 15.6.5-106, 15.6.5-107, 15.6.5-108, 15.6.5-109, 15.6.5-110
498	6.2.2-110, 6.2.2-111, 6.2.2-112, 6.2.2-113, 6.2.2-114, 6.2.2-115, 6.2.2-116, 6.2.2-117, 6.2.2-118, 6.2.2-119
507 ⁴	6.2.2-120 ³ , 6.2.2-121 ³ , 6.2.2-123 ³
511 ⁴	6.2.2-124 ³
514 ⁴	15.6.5-114 ³

Notes:

- ¹ – Response was made prior to August 25, 2011, and has subsequently been revised.
- ² – The response to Question 6.2.2-8 was identified in the August 25, 2011 closure plan; however, no revision is necessary.
- ³ – Question was not identified in the August 25, 2011 closure plan.
- ⁴ – RAI received after August 25, 2011.

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 paragraphs 6(b) and 6(c) above.

AREVA NP Packing Slip for NRC Correspondence

Date: 11/18/11

- Contents:
1. CD - ONE PDF FILE FOR ANP-10293P REV. 4
 2. CD - ONE PDF FILE FOR ANP-10293NP REV. 4
 3. LETTER NRC: 11:113 dated 11/18/11
 4. AFFIDAVIT dated 11/18/11
 5. _____
 6. _____
 7. _____

CDs: Proprietary (ONE COPY)
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