



December 20, 2011
NRC:11:124

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

**Request for Review and Approval of EMF-2103(P), Revision 2, Supplement 1, Revision 0,
"Realistic Large Break LOCA Methodology for Pressurized Water Reactors"**

Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of EMF-2103(P), Revision 2, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors," NRC:10:105, November 15, 2010.

Ref. 2: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Pressurized Water Reactor Safety Analysis Licensing Topical Reports," NRC:11:063, June 24, 2011.

AREVA NP Inc. (AREVA) requests the NRC's review and approval of the enclosure, EMF-2103(P), Revision 2, Supplement 1, Revision 0, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors." Revision 2 of EMF-2103(P) was submitted to the NRC on November 15, 2010 and is currently under review (Reference 1). EMF-2103(P)(A), Revision 2, plus the Supplement will constitute the approved methodology upon approval by the NRC and will be referenced together in plant applications.

During recent licensing reviews, the NRC staff identified various issues with EMF-2103(P)(A), Revision 0 and the transition package. In Reference 2, AREVA informed the NRC staff of our intention to develop a generic resolution to this issue via a supplement to the topical report. The submittal of the enclosed supplement to the referenced topical report fulfills this commitment.

Proprietary and non-proprietary versions of the topical report supplement are enclosed.

AREVA considers some of the material contained in the enclosed document 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.

In support of the Office of Nuclear Reactor Regulation's prioritization efforts, the prioritization scheme matrix is attached.

If you have any questions related to this submittal, please contact Ms. Gayle F. Elliott, Product Licensing Manager at 434-832-3347 or by e-mail at gayle.elliott@areva.com.

Sincerely,

Pedro Salas, Manager
Corporate Regulatory Affairs
AREVA NP Inc.

cc: H. D. Cruz
Project 728

AREVA NP INC.

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NRC

**EMF-92-116(P)(A), Revision 0, Supplement 1, Revision 0,
“Generic Mechanical Design Criteria for PWR Fuel Design”**

TR Prioritization Scheme Matrix			
*Industry input on shaded areas was not requested.			
Factors	Select the Criteria that the TR Satisfies	Points Assigned for Each Criteria	Total Points (if points are cumulative, total them for each factor in this column)
TR Classification (Points are cumulative)	Generic Safety Issue	6	1
	Emergent Technical Issue	3	
	Standard TR	1	
Applicability (Points are not cumulative)	Industry-Wide Implementation	3	2
	Applicable to entire groups of licensees (BWROG, PWROG, BWRVIP, etc.)	2	
	Applicable only to partial groups of licensees	1	
Specialized Resource Availability (Points are cumulative)	NRC staff expertise is readily available (The NRC staff will evaluate this criteria)	1.5	
	Technical data is available/readily accessible (The NRC staff will evaluate this criteria)	1	
	TR approval is needed by a certain date to support a licensing activity. Explain when and why.	0.5	
Total Points (Add the total points from each factor and total here):			3

A F F I D A V I T

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, 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 EMF-2103(P), Revision 2, Supplement 1, Revision 0, entitled "Realistic Large Break LOCA Methodology for Pressurized Water Reactors," dated December 2011, 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:

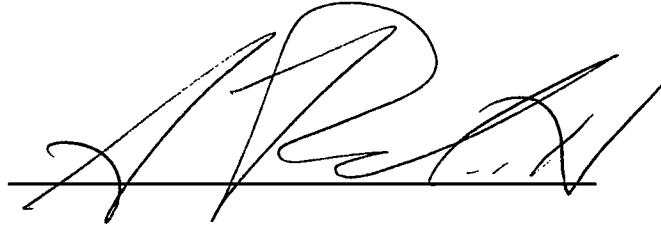
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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 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 have 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.

A handwritten signature in black ink, appearing to be 'APR', written over a horizontal line.

SUBSCRIBED before me this 20th
day of December, 2011.

A handwritten signature in black ink, reading 'Kathleen A. Bennett', written over a horizontal line.

Kathleen Ann Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/15
Reg. # 110864

