



April 6, 2012  
NRC:12:019

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

**Request for Review and Approval of ANP-10287P Revision 1 "Incore Trip Setpoint and Transient Methodology for U.S. EPR"**

Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10287P, 'Incore Trip Setpoint and Transient Methodology for U. S. EPR Topical Report'," NRC:07:068, November 27, 2007.

Ref. 2: Letter, A. W. Robinson (AREVA NP Inc.) to Document Control Desk (NRC), "U. S. EPR Design Certification Schedule for Responses to Open Items," NRC:12:008, February 21, 2012.

In Reference 1, AREVA NP Inc.(AREVA NP) submitted topical report ANP-10287P Revision 0, "Incore Trip Setpoint and Transient Methodology," for NRC review and approval. Topical report ANP-10275PA made a commitment in section 3.2, on page 3-28, that:"Other complex functions such as HCPL, low saturation margin, anti-dilution, HLPD and DNBR will be addressed in a separate topical report, for these functions, uncertainty is determined using another statistical methodology." The HLPD and DNBR functions are addressed in ANP-10287P Revision 0. ANP-10287P Revision 1 is being submitted to add two Appendices to the ANP-10287P Revision 0 topical report to address the complex trip functions: (1) Appendix F "U. S. EPR Anti-Dilution Function," and (2) Appendix G "Incore Complex Trip Functions – Reactor Trip on High Core Power Level and Low Margin to Saturation".

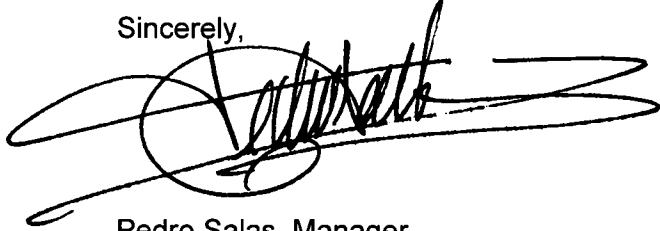
By August 30, 2013, another revision is planned to topical report ANP-10287P to respond to RAI 505 Question 07.01-33, as indicated in Attachment 2 to Reference 2. This future revision to the topical report will address a single undetected failure of a Self Powered Neutron Detector (SPND).

AREVA NP 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.

DO??  
HRO

If you have any questions related to this submittal, please contact Darrell Gardner by telephone at (704) 805-2355 or by e-mail at [darrell.gardner@areva.com](mailto:darrell.gardner@areva.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', is written over a circular stamp. The signature is stylized and somewhat obscured by the stamp and other scribbles.

Pedro Salas, Manager  
Corporate Regulatory Affairs  
AREVA NP Inc.

Enclosures

cc: G. Tesfaye  
Docket 52-020

A F F I D A V I T

COMMONWEALTH OF VIRGINIA            )  
  ) ss.  
COUNTY OF CAMPBELL                    )

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 "Request for Review and Approval of ANP-10287P Revision 1 "Incore Trip Setpoint and Transient Methodology for U.S. EPR," 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.

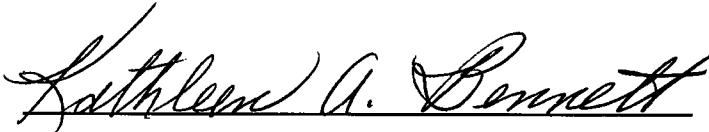
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited 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.

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

SUBSCRIBED before me this 5<sup>th</sup>  
day of April, 2012.

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

Kathleen A. Bennett  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/2015  
Reg. #110864

