



June 14, 2012  
NRC:12:038

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

**Submission of Technical Report ANP-10322P, "Qualification and Testing of the U.S. EPR Passive Autocatalytic Recombiner," in Support of the U.S. EPR Design Certification Application**

Ref. 1: E-mail, Getachew Tesfaye (NRC) to Russell Wells (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 474 (5550), FSAR Ch. 6," March 8, 2011.

Ref. 2: E-mail, Getachew Tesfaye (NRC) to Dennis Williford (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 540 (6300, 6308, 6329), FSAR Ch. 6," March 22, 2012.

In References 1 and 2, the NRC provided requests for additional information (RAI) regarding the qualification and testing of passive autocatalytic recombiners (PARs) as part of the U.S. EPR design certification application. AREVA NP Inc. (AREVA NP) is submitting the enclosed Technical Report ANP-10322P, "Qualification and Testing of the U.S. EPR Passive Autocatalytic Recombiner," to address certain questions in References 1 and 2, and to provide a basis for the qualification of the AREVA NP PARs. ANP-10322P describes the test program for qualifying the AREVA NP PARs, which are used for hydrogen reduction following certain postulated accident scenarios. AREVA NP will incorporate this report by reference in the U.S. EPR Final Safety Analysis Report.

AREVA NP considers some of the material contained in the enclosed technical report 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 enclosure to this letter are provided.

If you have any questions related to this submittal, please contact Mr. Darrell Gardner by telephone at 704-805-2355, or by e-mail to [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 printed name and title.

Pedro Salas, Director  
Regulatory Affairs  
AREVA NP Inc.

Enclosures

cc: G. Tesfaye  
Docket No. 52-020

**AREVA INC.**  
3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935  
Tel.: 434 832 3000 [www.areva.com](http://www.areva.com)

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NRD

AFFIDAVIT

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 letter NRC:12:038, "Submittal of Technical Report ANP-10322P, 'Qualification and Testing of the U.S. EPR Passive Autocatalytic Recombiner,' in Support of the U.S. EPR Design Certification Application," 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:

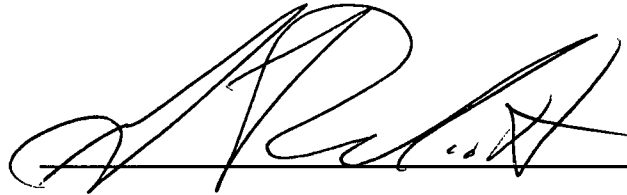
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or 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(a), 6(b), 6(c) and 6(d) above.

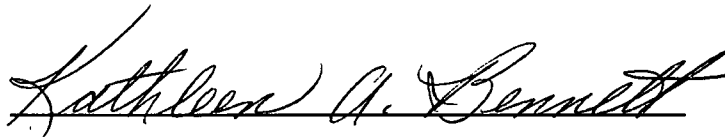
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited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

SUBSCRIBED before me this 14<sup>th</sup>  
day of June 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

