



July 17, 2012  
NRC:12:041

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

**U.S. EPR Design Certification GOTHIC Input Information in Support of the Response to RAI 462,  
Question 06.02.03-7**

- Ref. 1: E-mail, Getachew Tesfaye (NRC) to Russell Wells (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 462 (5258, 5259, 5260), FSAR Ch. 6," January 26, 2011.
- Ref. 2: E-Mail, Russell Wells (AREVA NP Inc.) to Getachew Tesfaye (NRC), "Response to U.S. EPR Design Certification Application RAI No. 462, FSAR Ch. 6, Supplement 4," July 22, 2011.
- Ref. 3: Letter, Sandra Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "NRC Request for U.S. EPR Design Certification GOTHIC Input Information," July 21, 2011, NRC:11:078.

In Reference 1, the NRC provided a request for additional information (RAI) regarding the U.S. EPR design certification application. Reference 2 provided a technically correct and complete response to nine questions, including Question 06.02.03-7. In the response to Question 06.02.03-7, AREVA NP Inc. (AREVA NP) indicated that the requested GOTHIC input decks would be provided on a compact disc, under a separate submittal. Reference 3 provided this separate submittal of the input files to the GOTHIC code. Upon subsequent discussion with NRC staff, it was determined that Reference 3 did not contain the appropriate input files. Therefore, we are resending the CD with the correct GOTHIC input files that support the response provided to Question 06.02.03-7 in Ref. 2. The response to this question has not changed, and there are no further commitments associated with this topic.

AREVA NP considers the information on the enclosed CD to be proprietary in its entirety; therefore, a non-proprietary version will not be provided. 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 information, 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,

Pedro Salas, Director  
Regulatory Affairs  
AREVA NP Inc.

Enclosures:

1. Proprietary CD containing GOTHIC input
2. Notarized Affidavit

cc: G. Tesfaye  
Docket 52-020

**AREVA INC.**

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

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NRD

A F F I D A V I T

COMMONWEALTH OF VIRGINIA        )  
  ) ss.  
COUNTY OF CAMPBELL                    )

1. My name is Russell Wells. I am U.S. EPR COLA Licensing Manager, 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 document titled U.S. EPR Design Certification GOTHIC Input Information in Support of the Response to RAI 462, Question 06.02.03-7 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(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.

Wells

SUBSCRIBED before me this 17<sup>th</sup>  
day of July 2012.

Kathleen A. Bennett

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

