



September 20, 2012
NRC:12:050

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

Publication of ANP-10303P-A, Revision 1, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report" (TAC No. ME1503)

Ref. 1: Letter, Sher Bahadur (NRC) to Pedro Salas (AREVA NP Inc.), "Final Safety Evaluation for AREVA NP Inc. (AREVA) ANP-10303P, Revision 1, 'SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report [TR]'," June 15, 2012 (TAC No. ME1503).

In Reference 1, the NRC accepted topical report ANP-10303P, Revision 1, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report," for referencing in licensing applications. The NRC requested that AREVA NP Inc. (AREVA NP) publish proprietary and non-proprietary versions of the report.

The published reports are constructed in accordance with guidance provided on the NRC website. Since AREVA NP considers some of the material contained in the enclosed response to be proprietary, an affidavit is enclosed, as required by 10 CFR 2.390(b), 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 Ms. Gayle Elliott, Product Licensing Manager, at 434-832-3347, or by e-mail at gayle.elliott@areva.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', is written over a faint, larger version of the signature.

Pedro Salas
Director, Regulatory Affairs

Enclosures

cc: H. D. Cruz
J. G. Rowley
Project 728

T 007
MRR

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 ANP-10303P-A, Revision 1, entitled "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report" dated June 2012 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.

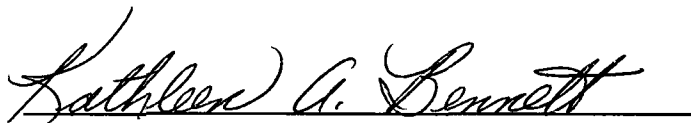
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited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

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SUBSCRIBED before me this 20th
day of September 2012.

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

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

