



May 28, 2013
NRC:13:028

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Submittal of ANP-10315P, Revision 2, "U.S. EPR Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report"

- Ref. 1: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "ANP-10315P, 'U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report'," NRC:11:028, March 28, 2011.
- Ref. 2: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "ANP-10315P, 'U.S. EPR Protection System Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report'," Revision 1, NRC:11:061, June 13, 2011.

AREVA NP Inc. (AREVA NP) proposed changes to the instrumentation and controls (I&C) architecture to the NRC Staff in a public meeting held on February 15, 2011. ANP-10315P, "U.S. EPR Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report," was provided in References 1 and 2, to incorporate the revised I&C architecture and to incorporate NRC feedback. Additional NRC staff feedback was incorporated into ANP-10315P, Revision 2, and is enclosed with this letter.

AREVA NP incorporated this report by reference into the U.S. EPR Final Safety Analysis Report (FSAR). The conforming changes to U.S. EPR FSAR will be transmitted to the NRC consistent with the schedule communicated in the February 15, 2011 public meeting. AREVA NP requests that the NRC incorporate the review of this revised report into the evaluation of the I&C design in the Safety Evaluation Report for the U.S. EPR FSAR in a manner consistent with other reports that are incorporated by reference in the U.S. EPR FSAR.

AREVA NP considers some of the material contained in the enclosures 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 attachments are enclosed.

If you have any questions related to this information, please contact Len Gucwa by telephone at (434) 832-3466, or by e-mail at Len.Gucwa.ext@areva.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas' with a stylized flourish at the end.

Pedro Salas, Director
Regulatory Affairs
AREVA NP Inc.

DOTT
KIRO

Enclosures:

1. ANP-10315P, Revision 2, "U.S. EPR Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report"
2. ANP-10315NP, Revision 2, "U.S. EPR Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report"
3. Notarized Affidavit

cc: A. M. Snyder
J. P. Segala
Docket 52-020

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

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 document ANP-10315P, Revision 2, "U.S. EPR Surveillance Testing and TELEPERM XS Self-Monitoring Technical Report," dated May 2013, 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:

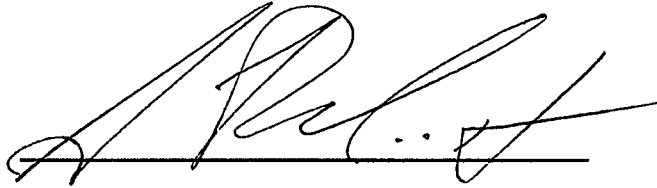
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or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

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

SUBSCRIBED before me this 28th
day of May 2013.

A handwritten signature in dark ink, appearing to be 'Sherry L. McFaden', written over a horizontal line.

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/2014
Reg.#7079129

