



June 7, 2013  
NRC:13:039

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

**Submission of Technical Report ANP-10288P, Revision 2, "U.S. EPR Post-LOCA Boron Precipitation and Boron Dilution"**

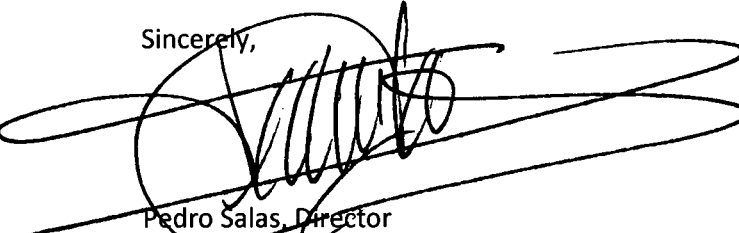
- Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Reports to be Referenced in the Application for Standard Design Certification of the U.S. EPR, (Project No. 733)," NRC:07:074, December 6, 2007.
- Ref. 2: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Response to Sixth Request for Additional Information Regarding ANP-10278P, 'U.S. EPR Realistic Large Break Loss of Coolant Accident Topical Report'," NRC:10:004, January 8, 2010.
- Ref. 3: E-mail, Getachew Tesfaye (NRC) to Martin C. Bryan (AREVA NP Inc.), "U.S. EPR Design Certification Application RAI No. 403 (4439), FSAR Ch. 15," June 2, 2010.

AREVA NP Inc. (AREVA NP) submitted Technical Report ANP-10288P, Revision 0, "U.S. EPR Post-LOCA Boron Precipitation and Boron Dilution Technical Report" in Reference 1. This technical report is in support of Tier 2 Chapter 15 of the U.S. EPR FSAR. ANP-10288P, Revision 1, was submitted in Reference 2. ANP-10288P, Revision 2, is being submitted to reflect the responses to RAI 403 (Reference 3).

AREVA NP considers some of the material contained in the enclosed response 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. A proprietary and a non-proprietary version of this response is 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](mailto:Len.Gucwa.ext@areva.com).

Sincerely,



Pedro Salas, Director  
Regulatory Affairs  
AREVA NP Inc.

**AREVA NP INC.**

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

DOTT  
HRO

Enclosures:

1. Proprietary Version of ANP-10288P, Revision 2, "U.S. EPR Post-LOCA Boron Precipitation and Boron Dilution"
2. Non-Proprietary Version of ANP-10288P, Revision 2, "U.S. EPR Post-LOCA Boron Precipitation and Boron Dilution"
3. Notarized Affidavit

cc: A. M. Snyder  
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 Technical Report ANP-10288P, Revision 2, entitled "U.S. EPR Post-LOCA Boron Precipitation and Boron Dilution," dated June 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:

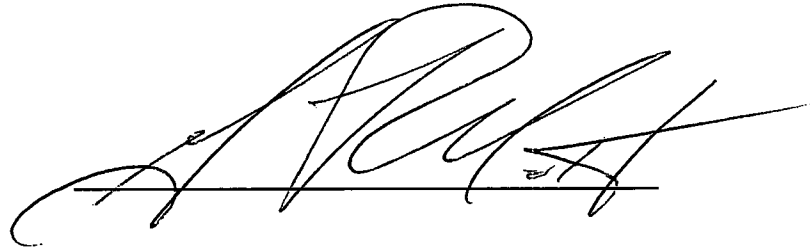
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or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

SUBSCRIBED before me this 7<sup>th</sup>  
day of June 2013.

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

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

