



August 23, 2013  
NRC:13:069

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

**Reply to Notice of Violation**

Ref. 1: Letter, Kerri Kavanagh (NRC) to Pedro Salas (AREVA NP Inc.), "Nuclear Regulatory Commission Inspection Report No. 05200020/2013-201 and Notice of Violation," June 13, 2013.

Ref. 2: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Reply to Notice of Violation," NRC:13:051, July 8, 2013.

Ref. 3: Letter, Kerri Kavanagh (NRC) to Pedro Salas (AREVA NP Inc.), "AREVA Response to U.S. Nuclear Regulatory Commission Inspection Report No. 05200020/2013-201 and Notice of Violation," July 24, 2013.

AREVA NP Inc. (AREVA NP) received an inspection report and Notice of Violation in Reference 1. AREVA NP's response was submitted to the NRC in Reference 2. In Reference 3, NRC stated that certain aspects of our response needed to be addressed in further detail. This letter and its enclosures provide AREVA NP's reply to the additional information requested in Reference 3.

If you have any questions related to this submittal, please contact Ms. Gayle F. Elliott, Product Licensing Manager at 434-832-3347 or by e-mail at [Gayle.Elliott@areva.com](mailto:Gayle.Elliott@areva.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', is written over the typed name.

Pedro Salas, Director  
Regulatory Affairs  
AREVA NP Inc.

**AREVA NP INC.**

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*JEOL  
NRO*

cc: K.A. Kavanagh, Chief  
Quality Assurance Branch  
Division of Construction Inspection and Operational Programs  
Office of New Reactors

J.G. Rowley  
Project 728

Enclosure:

1. Attachment A, "Inspection Report Number 05200020/2013-201, Second Reply to Notice of Violation"

Attachment A

Inspection Report Number 05200020/2013-201  
Second Reply to Notice of Violation

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Restatement of NRC Request:

Violation No. 05200020/2013-201-01 was cited in the NOV because the NRC inspectors identified that AREVA failed to establish measures for the selection and review for suitability of its soil-structure interaction analysis computer program. Specifically, AREVA did not perform an adequate commercial-grade dedication technical evaluation to sufficiently identify the performance requirements and critical characteristics for the MTR-System for Analysis of Soil-Structure Interaction (MTR/SASSI) program and did not include or reference the limits of the dedicated capabilities within the related dedication plans.

Your response to Violation No. 05200020/2013-201-01 did not provide adequate detail for the staff to conclude that your proposed corrective actions would completely address the identified violation. Specifically, Attachment A, Item II.(3).1.(a), of your July 8, 2013, letter states in part, "Update MTR/SASSI dedication documents to include additional test problems to cover the higher shear wave velocities and computed frequencies up to 50 Hz, [...]." With respect to higher shear wave velocities, please specify the actual value or a range of values.

Attachment A Item II.(2), of your July 8, 2013, letter, states in part, "[...] an additional interim corrective action in the form of a Lesson's Learned entry into AREVA NP's Corrective Action Program was made to provide an interim barrier." In order for us to complete our records, it would be helpful if you would also provide the Corrective Action Program number associated with the interim barrier.

AREVA NP Response:

MTR/SASSI dedication documents will be updated to include additional test problems to increase the uniform halfspace shear wave velocity to 5,000 m/s and computed frequencies up to 50 Hz.

A Lessons Learned Condition Report #2013-2098 was initiated that includes a software dedication checklist that can be used by engineering to ensure Procedure 0902-29 requirements are specifically addressed in the dedication documentation.