



October 21, 2013

NRC:13:077

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

**Path Forward for U.S. EPR Design Certification Application**

52-2D

Ref. 1: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "NRC Staff Concerns Related to the U.S. EPR Digital Instrumentation and Control Systems Design," NRC:13:061, July 26, 2013.

The purpose of this letter is to communicate the intent of AREVA NP Inc. (AREVA NP) to systematically rephase and complete the remaining activities supporting the U.S. EPR design certification (DC) application. As part of this effort, AREVA NP is refocusing its closure plans from a technical topic centered approach to an FSAR chapter centered approach; with prioritization given to the chapters that are closest to completion. Preliminary conversations with the NRC staff have indicated concurrence with this approach. AREVA NP is currently revising closure plans, which, per NRC request, will undergo detailed discussions with the NRC prior to submittal.

The revised closure plans cover the scope of the remaining actions needed to demonstrate compliance with NRC guidance, and to support NRC completion of the respective U.S. EPR FSAR chapter safety evaluation reports. AREVA NP will present the closure plans to the NRC in a series of meetings. The first meeting is planned for October 24-25, 2013 during which AREVA NP will expand on the closure process, and work with the NRC to achieve alignment toward completion of DC Review Phase 4. This first meeting will focus on AREVA NP and the NRC reaching agreement regarding the actions necessary to complete closure of the six U.S. EPR FSAR chapters nearest to completion. Subsequent closure plan meetings will address the remaining U.S. EPR FSAR chapters, including the activities the NRC believes are needed before it can make a safety finding. The identified open items will then be documented in closure plan letters, which will be submitted to NRC following each meeting.

AREVA NP has grouped U.S. EPR FSAR chapters into three readiness-for-closure categories: near term closure, moderate duration, and last to close (or Groups A, B and C, respectively). AREVA NP expects to complete a review of all U.S. EPR FSAR chapters with the NRC, before the end of calendar year 2013. AREVA NP has placed U.S. EPR FSAR Chapters 2, 5, 8, 10, 13, and 17 into Group A, because AREVA NP considers that these chapters can be completed in the January-March 2014 timeframe which in turn will support NRC issuance of associated safety evaluation reports without open items. ACRS meetings could then be held.

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The scheduling of specific tasks will be the subject of additional discussions between AREVA NP and the NRC, following the October 24-25, 2013 public meeting.

In subsequent discussions AREVA NP will address the technical issues remaining to complete the Group B and Group C chapters. Chapters in Groups B and C are expected to be more challenging than Group A based on the scope and complexity of the technical issues that must be resolved. Currently, AREVA NP views U.S. EPR FSAR Chapter 7 as critical path to Phase 4 completion because of the need to resolve digital instrumentation and controls (I&C) issues. Because of the overall schedule dependency on closure of digital I&C issues, a heightened degree of attention and emphasis will also be placed on these activities.

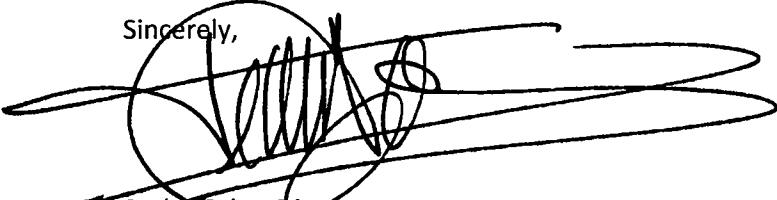
Closure plans will incorporate a "freeze" on the design and other changes for the respective U.S. EPR FSAR chapter. After the chapter freeze, any additional changes will be subject to an ISG-011 process for finalizing licensing basis information. Because this process potentially impacts the U.S. EPR combined license (COL) applicants, AREVA NP and UniStar Nuclear Energy, LLC are examining ways to enhance efficiency by integrating DC and R-COLA chapter closure plans.

AREVA NP encourages periodic meetings between the staff of NRC and AREVA NP to discuss and resolve complexities in technical issues. Clear communications are critical to this process. AREVA NP is committed to engaging in open, transparent, and timely interactions with the NRC.

As stated in Reference 1, AREVA NP remains fully committed to completing the design certification rulemaking, and appreciates the NRC's commitment to continue the review of the remaining issues concerning the U.S. EPR DC.

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

Sincerely,



Pedro Salas, Director  
Regulatory Affairs  
AREVA NP Inc.