



KHNP

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June 2, 2014
Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Jeffrey Ciocco
Division of New Reactor Licensing

Project No.0782
MKD/NW-14-0014L

Subject: KHNP Responses to Initial Requests for Additional Information to Develop a MELCOR Input Deck for APR1400

Reference: 1) ERI Letter to NRC (ERI/NRC 2014-01-24B), dated January 24, 2014

KHNP is hereby submitting responses to the initial Requests for Additional Information (RAIs) to develop a MELCOR input deck for the APR1400.

Please note that each RAI is numbered for tracking purpose. The responses for the RAIs 1.1-18, 1.1-30, 1.2-4, and 1.3-17 will be provided by the end of June, 2014. In addition, KHNP would like to discuss the availability of the response to the RAI on auxiliary building (1.3-19) at your convenience.

Enclosure 1 contains one copy of the associated affidavit. Enclosure 2 provides KHNP Responses to Initial Requests for Additional Information to Develop a MELCOR Input Deck for APR1400 (Proprietary). Electronic files for drawings associated with Enclosure 2 are provided in a CD, which is mailed to Document Control Desk.

If additional information or clarification is required, please contact Yunho Kim, Director of KHNP Washington DC Center at yunhokim@khnp.co.kr or 703-388-0592.

Sincerely,

Myung-Ki Kim
Project Manager
Advanced Reactors Development Laboratory
Korea Hydro and Nuclear Power Co., Ltd

Enclosure:

1. Affidavit KAW-14-0014
2. KHNP Responses to Initial Requests for Additional Information to Develop a MELCOR Input Deck for APR1400 (Proprietary)

ENCLOSURE 1

Affidavit KAW-14-0014

I, Jae-yong Lee, state the following:

1. I am the Director of Korea Hydro & Nuclear Power Co., Ltd. (KHNP), and as such I am authorized to request withholding the information transmitted with this letter from public disclosure and to execute this affidavit.
2. I am familiar with the criteria applied by KHNP to determine whether certain information is proprietary, and with the policies established by KHNP to ensure the proper application of these criteria.
3. The information, KHNP Response to Initial Requests for Additional Information to Develop a MELCOR Input Deck for APR1400 (Proprietary), transmitted with this letter has been classified by KHNP as proprietary in accordance with the policies for the control and protection of proprietary and confidential information. The information regarded as proprietary is identified and marked consistent with the requirements of 10 CFR 2.390, § (b)(1)(i). Accordingly, the proprietary information is enclosed within brackets and the right-hand bracket carries a notation of “TS” to indicate that the trade secret nature of the information claimed to be proprietary is the basis for proposing that the information so identified be withheld from public disclosure.
4. Pursuant to the considerations set forth in 10 CFR Section 2.390(a), KHNP considers the information classified as proprietary to be “trade secret” information since it is design, analysis, or test information that would be difficult for a competitor to reproduce and hence provides an economic and competitive advantage to KHNP.
5. The need for designating the information as proprietary has been raised within KHNP. The information is being treated proprietary and confidential and has not been disclosed by KHNP to the public.
6. Nondisclosure of the proprietary information transmitted with this letter is vital to the competitiveness held by KHNP and, hence, disclosure of the proprietary information transmitted in with this letter would have negative commercial impacts on the competitive position of KHNP in the U.S. nuclear market.
7. In accordance with KHNP policy, proprietary information contained in this document may be, or may have been, made available on a limited basis to regulatory bodies, customers, potential customers, and their agents, suppliers, and licensees, and others under suitable agreements providing for nondisclosure and limited use of the information.



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I declare that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed on June 2, 2014.

Jae-yong Lee

Director

APR1400 Licensing Team

Korea Hydro & Nuclear Power Co., Ltd.