



KHNP

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June 3, 2014

Document Control Desk

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Attention: Mr. Jeff Ciocco

Division of New Reactor Licensing

Project No.0782

MKD/NW-14-0015L

Subject: Submittal of Revised Meeting Materials for the May 28-29 Pre-Application Review Meeting on APR1400 Design Information

The purpose of this letter is to transmit the revised meeting materials for the Pre-Application Review Meeting which was held on May 28-29 between NRC and KEPCO/KHNP.

Enclosure 1 contains one copy of the associated affidavit. Enclosure 2 provides “Safety I&C System Platform Requirements TeR” (Proprietary), and Enclosure 3 Provides “Safety I&C System Platform Requirements TeR” (Non-proprietary). Enclosure 4 provides “Response Time Analysis TeR” (Proprietary), and Enclosure 5 provides “Response Time Analysis TeR” (Non-proprietary). Enclosure 6 provides “Control System CCF Analysis TeR” (Proprietary), and Enclosure 7 provides “Control System CCF Analysis TeR” (Non-proprietary). Enclosure 8 provides “APR1400 Physical Security Overview” (Proprietary), and Enclosure 9 provides “APR1400 Physical Security Overview” (Non-proprietary). Enclosure 10 provides “APR1400 Mitigation Strategies for BDB External Event” (Proprietary), and Enclosure 11 provides “APR1400 Mitigation Strategies for BDB External Event” (Non-proprietary). Finally, Enclosure 12 provides “APR1400 HFE Documentation Improvement Status” (Proprietary), and Enclosure 13 provides “APR1400 HFE Documentation Improvement Status” (Non-proprietary).

If the NRC has questions concerning any aspect of this submittal, please contact Yun-ho Kim, Director of KHNP Washington DC Center at yunhokim@khnp.co.kr or 703-388-0592.

Sincerely,

M. K. Kim

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

Enclosures:

1. Affidavit KAW-14-0015
2. "Safety I&C System Platform Requirements TeR" (Proprietary) (APR1400-Z-J-EC-14002-P)
3. "Safety I&C System Platform Requirements TeR" (Non-Proprietary) (APR1400-Z-J-EC-14002-NP)
4. "Response Time Analysis TeR" (Proprietary) (APR1400-Z-J-EC-14003-P)
5. "Response Time Analysis TeR" (Non-Proprietary) (APR1400-Z-J-EC-14003-NP)
6. "Control System CCF Analysis TeR" (Proprietary) (APR1400-Z-J-EC-14004-P)
7. "Control System CCF Analysis TeR" (Non-Proprietary) (APR1400-Z-J-EC-14004-NP)
8. "APR1400 Physical Security Overview" (Proprietary) (APR1400-E-Y-EC-14001-P)
9. "APR1400 Physical Security Overview" (Non-Proprietary) (APR1400-E-Y-EC-14001-NP)
10. "APR1400 Mitigation Strategies for BDB External Event" (Proprietary) (APR1400-E-X-EC-14001-P)
11. "APR1400 Mitigation Strategies for BDB External Event" (Non-Proprietary) (APR1400-E-X-EC-14001-NP)
12. "APR1400 HFE Documentation Improvement Status" (Proprietary) (APR1400-K-I-EC-14001-P)
13. "APR1400 HFE Documentation Improvement Status" (Non-Proprietary) (APR1400-K-I-EC-14001-NP)

ENCLOSURE 1

Affidavit KAW-14-0015

I, Jae-yong Lee, state the following:

1. I am the General Manager 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, APR1400-Z-J-EC-14002-P, APR1400-Z-J-EC-14003-P, APR1400-Z-J-EC-14004-P, APR1400-E-Y-EC-14001-P, APR1400-E-X-EC-14001-P, APR1400-K-I-EC-14001-P 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



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under suitable agreements providing for nondisclosure and limited use of the information.

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

Executed on June 3, 2014.

Jae-yong Lee

General Manager

APR1400 Licensing Team

Central Research Institute

Korea Hydro & Nuclear Power Co., Ltd.

ENCLOSURE 2

APR1400-Z-J-EC-14002-P
“Safety I&C System Platform Requirements TeR”

(Proprietary)

May 2014

ENCLOSURE 3

APR1400-Z-J-EC-14002-NP
“Safety I&C System Platform Requirements TeR”

(Non-Proprietary)

May 2014

ENCLOSURE 4

APR1400-Z-J-EC-14003-P
“Response Time Analysis TeR”

(Proprietary)

May 2014

ENCLOSURE 5

APR1400-Z-J-EC-14003-NP
“Response Time Analysis TeR”

(Non-Proprietary)

May 2014

ENCLOSURE 6

APR1400-Z-J-EC-14004-P
“Control System CCF Analysis TeR”

(Proprietary)

May 2014

ENCLOSURE 7

APR1400-Z-J-EC-14004-NP
“Control System CCF Analysis TeR”

(Non-Proprietary)

May 2014

ENCLOSURE 8

APR1400-E-Y-EC-14001-P
“APR1400 Physical Security Overview”

(Proprietary)

May 2014

ENCLOSURE 9

APR1400-E-Y-EC-14001-NP
“APR1400 Physical Security Overview”

(Non-Proprietary)

May 2014

ENCLOSURE 10

APR1400-E-X-EC-14001-P
“APR1400 Mitigation Strategies for BDB External Event”

(Proprietary)

May 2014

ENCLOSURE 11

APR1400-E-X-EC-14001-NP
“APR1400 Mitigation Strategies for BDB External Event”

(Non-Proprietary)

May 2014

ENCLOSURE 12

APR1400-K-I-EC-14001-P
“APR1400 HFE Documentation Improvement Status”

(Proprietary)

May 2014

ENCLOSURE 13

APR1400-K-I-EC-14001-NP
“APR1400 HFE Documentation Improvement Status”

(Non-Proprietary)

May 2014