



**KHNP**

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June 26, 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-14-0020L

**Subject: KHNP Response to RAI 4-7542**

**Reference: 1) NRC Request for Additional Information 4-7542, dated May 27, 2014**  
**2) KHNP Topical Report: PLUS7 Fuel Design for the APR1400, Revision 0, November 2012 (APR1400-F-M-TR-13001)**

KHNP is hereby submitting responses to the Request for Additional Information (RAI) 4-7542, dated May 27, 2014. This RAI response addresses all the ten (10) questions of the RAI 4-7542.

Enclosure 1 contains one copy of the associated affidavit. Enclosure 2 provides "KHNP Response to Request for Additional Information No 4-7542" (Proprietary), and Enclosure 3 provides "KHNP Response to Request for Additional Information No 4-7542" (Non-proprietary).

If additional information or clarification is required, please contact Yunho Kim, Director of KHNP Washington DC Center at [yunhokim@khnp.co.kr](mailto: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-14-0020
2. KHNP Responses to Request for Additional Information No. 4-7542 (Proprietary)
3. KHNP Responses to Request for Additional Information No. 4-7542 (Non-Proprietary)

## ENCLOSURE 1

### Affidavit KAW-14-0020

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 Responses to Request for Additional Information No. 4-7542 (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 26, 2014.

 -

Jae-yong Lee

Director

APR1400 Licensing Team

Korea Hydro & Nuclear Power Co., Ltd.

## **ENCLOSURE 2**

“ KHNP Responses to Request for Additional Information No. 4-7542”  
(Proprietary)

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**ENCLOSURE 3**

“ KHNP Responses to Request for Additional Information No. 4-7542”  
(Non-Proprietary)

June 2014