



KHNP

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January 22, 2015
Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Kerri A. Kavanagh, Chief
Quality Assurance Vendor Inspection Branch

Project No.0782
MKD/NW-15-0001L

**Subject: Response to RAI Regarding KHNP's Response to the U.S. NRC Inspection Report
No. 99901453/2014-201**

**Reference: 1) NRC Letter to KHNP: ML14353A136, "KOREA HYDRO AND NUCLEAR
POWER COMPANY'S RESPONSE TO THE U.S. NUCLEAR
REGULATORY COMMISSION INSPECTION REPORT NO.
99901453/2014-201, NOTICE OF VIOLATIONS" dated December 23, 2014**
**2) KHNP Letter to NRC: MKD/NW-14-0035L, "Reply to a Notice of Violation
No. 99901453/2014-201" dated December 10, 2014**

The purpose of this letter is to submit the Response to RAI Regarding KHNP's Response to the U.S. NRC Inspection Report No. 99901453/2014-201.

Enclosure 1 contains one copy of the associated affidavit. Enclosure 2 provides "Response to RAI Regarding KHNP's Response to the U.S. NRC Inspection Report No. 99901453/2014-201" (Proprietary), and Enclosure 3 provides "Response to RAI Regarding KHNP's Response to the U.S. NRC Inspection Report No. 99901453/2014-201" (Non-proprietary). In addition, Enclosure 4 provides "In-vessel Downstream Effect Tests for the APR1400" (proprietary), and Enclosure 5 provides "In-vessel Downstream Effect Tests for the APR1400" (Non-proprietary).

If additional information or clarification is required, please contact Yunho Kim, director of KHNP Washington DC center at yunho.kim@khnp.co.kr or 703-388-0592.

Sincerely,

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Enclosures:

1. Affidavit KAW-15-0001
2. Response to RAI Regarding KHNP's Response to the U.S. NRC Inspection Report
No. 99901453/2014-201 (Proprietary)
3. Response to RAI Regarding KHNP's Response to the U.S. NRC Inspection Report
No. 99901453/2014-201 (Non-Proprietary)
4. Technical Report, "In-vessel Downstream Effect Tests for the APR1400" (Proprietary)
(APR1400-K-A-NR-14001-P)
5. Technical Report, "In-vessel Downstream Effect Tests for the APR1400" (Non-Proprietary)
(APR1400-K-A-NR-14001-NP)

CC: Mr. Jeff Ciocco
Division of New Reactor Licensing



ENCLOSURE 1

Affidavit KAW-15-0001

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, Response to RAI Regarding KHNP's Response to the U.S. NRC Inspection Report No. 99901453/2014-201 (Proprietary) and APR1400-K-A-NR-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 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 January 22, 2015.

Jae-yong Lee

General Manager

APR1400 Licensing Team

Central Research Institute

Korea Hydro & Nuclear Power Co., Ltd.

