



KHNP

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June 15, 2015
Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Jeff Ciocco
Division of New Reactor Licensing

Docket No. 52-046
MKD/NW-15-0026L

Subject: Response to RAI 11-7889

Reference: NRC Request for Additional Information 11-7889, dated May 15, 2015

KHNP is hereby submitting the response to RAI 11-7889 dated May 15, 2015. The RAI response addresses question 13.05.02.01-1. Enclosure 1 contains a copy of the associated affidavit. Enclosure 2 contains the response to RAI 11-7889 (Non-Proprietary). Enclosure 3 offers the APR1400 Emergency Operating Guidelines (Proprietary). Lastly, Enclosure 4 provides the Summary of Significant Safety Deviations for APR1400 EOGs (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,

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

Enclosures:

1. Affidavit KAW-15-0026
2. Response to RAI 11-7889 (Non-Proprietary)
3. APR1400 Emergency Operating Guidelines (Proprietary)
4. Summary of Significant Safety Deviations for APR1400 EOGs (Proprietary)

ENCLOSURE 1

Affidavit KAW-15-0026

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 Emergency Operating Guidelines and Summary of Significant Safety Deviations for APR1400 EOGs, 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 15, 2015.

Jae-yong Lee
General Manager
APR1400 Licensing Team
Central Research Institute
Korea Hydro & Nuclear Power Co., Ltd.

Enclosure 2

Response to RAI 11-7889

(Non-Proprietary)

June 15, 2015

Enclosure 3

APR1400 Emergency Operating Guidelines

(Proprietary)

June 15, 2015

Enclosure 4

Summary of Significant Safety Deviations for APR1400 EOGs

(Proprietary)

June 15, 2015