



KHNP

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October 6, 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-15-0179L

Subject: Submittal of Response to Open Items from the CEDM Audit Ending July 15, 2015

Reference: KHNP Letter MKD/NW-15-0095L, Response to RAI 85-7949, dated September 10, 2015

The purpose of this letter is to transmit the responses to Open Items regarding the audit of Section 3.9.4 on Control Element Drive Mechanisms (CEDMs) that was exited on July 15, 2015.

The response being submitted is as follows:

KHNP Action Item #	Open Item #
3-34.3	Open Item 1
3-34.4	Open Item 2
3-34.5	Open Item 3
3-34.7	Open Item 5
3-34.8	Open Item 6
3-34.9	Open Item 7

The response to Open Item 4 (action item 3-34.6) is not provided with this letter since it was previously described in the response to question 03.09.04-1 of RAI 85-7949, submitted September 10, 2015.

Enclosure 1 contains a copy of the associated affidavit. Enclosure 2 provides the responses to the Open Items (Proprietary). Enclosure 3 provides the responses to the CEDM Open Items (Non-Proprietary).

If additional information or clarification is required, please contact Daegun Ahn, Director of KHNP Washington DC Center at ahn.daegun@khnp.co.kr or 703-388-0592.

Sincerely,

Jae-yong Lee



Project Manager
Advanced Reactors Development Laboratory
Korea Hydro and Nuclear Power Co., Ltd

Enclosures:

1. Affidavit KAW-15-0179
2. Response to CEDM Open Items (Proprietary)
3. Response to CEDM Open Items (Non-Proprietary)

Enclosure 1

Affidavit KAW-15-0179

I, Yun-ho Kim, 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 CEDM Open Items (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.

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

Executed on October 6, 2015.



Yun-ho Kim
General Manager
APR1400 Licensing Team
Central Research Institute
Korea Hydro and Nuclear Power Co., Ltd

Enclosure 2

Response to CEDM Open Items

(Proprietary)

October 6, 2015

Enclosure 3

Response to CEDM Open Items

(Non-Proprietary)

October 6, 2015