



February 19, 2016  
NRC:16:006

U.S. Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

**Revised Pages for EMF-2103(P), Revision 3, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors"**

- Ref. 1: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of EMF-2103(P), Revision 3, 'PWR Realistic Large Break LOCA Methodology for Pressurized Water Reactors'," NRC:13:072, September 13, 2013.
- Ref. 2: Letter, Gary Peters (AREVA NP Inc.) to Document Control Desk (NRC), "Response to First and Second Request for Additional Information Regarding EMF-2103(P), Revision 3, 'PWR Realistic Large Break LOCA Methodology for Pressurized Water Reactors'," February 16, 2016.
- Ref. 3: Letter, Pedro Salas (AREVA NP Inc.) to Document Control Desk (NEC), "Errata and Revised Sample Problems for EMF-2103P, Revision 3, 'Realistic Large Break LOCA Methodology for Pressurized Water Reactors'," January 16, 2015.

AREVA Inc. (AREVA) requested the NRC's review and approval of the topical report EMF-2103(P), Revision 3, "PWR Realistic Large Break LOCA Methodology for Pressurized Water Reactors" in Reference 1. AREVA provided a complete set of RAI (Request for Additional Information) responses for this Reference 1 submittal in Reference 2.

A complete set of EMF-2103(P), Revision 3 marked-up pages is enclosed. The enclosed marked-up pages incorporate those previously submitted in Reference 3. The markups also include minor text corrections, including corrections to typographical errors and text inconsistencies. The initial page of the enclosure lists the changes and the nature of the changes to aid in the NRC's review.

AREVA considers some of the information contained in the enclosed document to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and Non-Proprietary versions of the marked-up pages are attached.

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**AREVA INC.**

If you have any questions related to this information, please contact Morris E. Byram, Product Licensing Manager, by telephone at (434) 832-4665, or by e-mail at [Morris.Byram@areva.com](mailto:Morris.Byram@areva.com).

Sincerely,



Gary Peters, Director  
Licensing and Regulatory Affairs  
AREVA Inc.

cc: J. G. Rowley  
Project 728

Enclosures:

1. Proprietary version of EMF-2103(P), Revision 3, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors," Revised Pages.
2. Non-Proprietary version of EMF-2103(P), Revision 3, "Realistic Large Break LOCA Methodology for Pressurized Water Reactors," Revised Pages.
3. Notarized Affidavit



requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(c) and 6(d) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Thomas E. Bynum

SUBSCRIBED before me this 17<sup>th</sup>  
day of February, 2016.

Ella E. Carr-Payne 309873

