



**KHNP**

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April 25, 2016  
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-16-0411L

**Subject: Revised Response to RAI 225-8254 for Question 12.03-22**

- References:**
- 1) NRC Request for Additional Information RAI 225-8254, dated September 24, 2015
  - 2) KHNP Letter MKD/NW-15-0407L, Response to RAI 225-8254 for Questions on a 60-Day Response Cycle, dated December 31, 2015
  - 3) KHNP Letter MKD/NW-16-0045L, Response to RAI 225-8254 for Question 12.03-13, dated January 18, 2016
  - 4) KHNP Letter MKD/NW-16-0061L, Response to RAI 225-8254 for Question 12.03-12, dated January 26, 2016
  - 5) KHNP Letter MKD/NW-16-0075L, Response to RAI 225-8254 for Question 12.03-20 and 12.03-21, dated January 27, 2016
  - 6) KHNP Letter MKD/NW-16-0092L, Response to RAI 225-8254 for Questions 12.03-17 and 12.03-22, dated January 29, 2016
  - 7) Clarification call between NRC and KHNP conducted on February 25, 2016

KHNP is hereby submitting the revised response to RAI 225-8254, dated September 24, 2015. The RAI revised response addresses Question 12.03-22 as discussed with NRC staff during a clarification call on February 25, 2016.

Enclosure 1 contains a copy of the associated affidavit. Enclosure 2 provides the revised response to RAI 225-8254 for Question 12.03-22 (Proprietary). Enclosure 3 provides the revised response to RAI 225-8254 for Question 12.03-22 (Non-Proprietary).

If additional information or clarification is required, please contact Daegeun Ahn, Director of KHNP Washington DC Center at [ahn.daegeun@khnp.co.kr](mailto:ahn.daegeun@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-16-0411
2. Revised Response to RAI 225-8254 for Question 12.03-22 (Proprietary)
3. Revised Response to RAI 225-8254 for Question 12.03-22 (Non-Proprietary)

## **Enclosure 1**

### **Affidavit KAW-16-0411**

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, Revised Response to RAI 225-8254 for Question 12.03-22 (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 April 25, 2016.



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

**Enclosure 2**

Revised Response to RAI 225-8254 for Question 12.03-22

(Proprietary)

April 25, 2016

## **Enclosure 3**

Revised Response to RAI 225-8254 for Question 12.03-22

(Non-Proprietary)

April 25, 2016