KHNP
KOREA HYDRO & NUCLEAR POWER CO., LTD
70-1312-gil, Yuseong-daero, Yuseong-gu, Daejeon, 305-343, KOREA
Tel: +82-42-870-5740 / Fax: +82-42-870-5779
http://www.khnp.co.kr

May 13, 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-16-0502L

Subject: Response to RAI 352-8205 for Question 18-66

References: 1) NRC Request for Additional Information 352-8205, dated December 22, 2015
2) KHNP Letter MKD/NW-16-0222L, Response to RAI 352-8205, dated March 14, 2016
3) KHNP Letter MKD/NW-16-0291L, Response to RAI 352-8205 for Question 18-64, dated April 2, 2016
4) KHNP Letter MKD/NW-16-0302L, Response to RAI 352-8205 for Questions 18-72 and 18-74, dated April 5, 2016
5) KHNP Letter MKD/NW-16-0312L, Response to RAI 352-8205 for Questions 18-82, dated April 15, 2016

KHNP is hereby submitting the response to RAI 352-8205, dated December 22, 2015. The response addresses Question 18-66.

Enclosure 1 contains a copy of the associated affidavit. Enclosure 2 provides the response to RAI 352-8205 for Question 18-66 (Proprietary). Enclosure 3 provides the response to RAI 352-8205 for Question 18-66 (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 or 703-388-0592.

Sincerely,

Jae-yong Lee
Project Manager
Advanced Reactors Development Laboratory
Korea Hydro and Nuclear Power Co., Ltd

Enclosures:

KHNP
KOREA HYDRO & NUCLEAR POWER CO., LTD

1. Affidavit KAW-16-0502
2. Response to RAI 352-8205 for Question 18-66 (Proprietary)
3. Response to RAI 352-8205 for Question 18-66 (Non-Proprietary)

KHNP
KOREA HYDRO & NUCLEAR POWER CO., LTD

Enclosure 1

Affidavit KAW-16-0502

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 RAI 352-8205 for Question 18-66 (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.

KHNP
KOREA HYDRO & NUCLEAR POWER CO., LTD

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

Executed on May 13, 2016.

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

KHNP
KOREA HYDRO & NUCLEAR POWER CO., LTD

Enclosure 2

Response to RAI 352-8205 for Question 18-66

(Proprietary)

May 13, 2016

KHNP
KOREA HYDRO & NUCLEAR POWER CO., LTD

Enclosure 3

Response to RAI 352-8205 for Question 18-66

(Non-Proprietary)

May 13, 2016