



KHNP

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December 7, 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-16-1145L

Subject: Revised Response to RAI 356-7881 for Question 07-8

References: 1) NRC Request for Additional Information 356-7881, dated January 4, 2016
2) KHNP Letter MKD/NW-16-0388L Response to RAI 356-7881 for Questions 07-3, 07-5, 07-8, 07-13, 07-14, 07-16, and 07-18, dated May 5, 2016

KHNP is hereby submitting a revised response to RAI 356-7881, dated January 4, 2016. The RAI revised response addresses Question 07-8 and provides information on common cause failures of imbedded software for specific components.

Enclosure 1 contains a copy of the associated affidavit. Enclosure 2 provides the revised response to RAI 356-7881 for Question 07-8 (Proprietary). Enclosure 3 provides the revised response to RAI 356-7881 for Question 07-8 (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
Director
Advanced Reactors Development Laboratory
Korea Hydro & Nuclear Power Co., Ltd.

Enclosures:

1. Affidavit KAW-16-1145
2. Revised Response to RAI 356-7881 for Question 07-8 (Proprietary)
3. Revised Response to RAI 356-7881 for Question 07-8 (Non-Proprietary)

Enclosure 1

Affidavit KAW-16-1145

I, Jae-yong Lee, state the following:

1. I am the Director 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, KHNP Revised Response to RAI 356-7881 for Question 07-8 (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 December 7, 2016.

A handwritten signature in black ink, appearing to be 'Yun-ho Kim', written over a horizontal line.

Yun-ho Kim
Project Manager
APR1400 Licensing Team
Korea Hydro and Nuclear Power Co., Ltd

Enclosure 2

Revised Response to RAI 356-7881 for Question 07-8

(Proprietary)

December 7, 2016

Enclosure 3

Revised Response to RAI 356-7881 for Question 07-8

(Non-Proprietary)

December 7, 2016