



Program Management Office  
102 Addison Road  
Windsor, Connecticut 06095

October 5, 2010

PROS 0694

OG-10-343

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Subject: PWR Owners Group  
**For Information Only — Technical Justification Documents 51-9131378-002/003, “Technical Justification for Detection of Leak Path Indications in Reactor Pressure Vessel Upper Head Penetrations, PA-MSC-0532**

The PWROG project includes separate technical justifications from AREVA and Westinghouse (WesDyne). The Westinghouse portion was completed and was transmitted to the NRC under PWROG Letter OG-10-02, dated January 4, 2010. The AREVA NP portion is complete and is now being transmitted.

On March 17, 2009, representatives from the PWROG, NEI, EPRI, MRP and Westinghouse had an information meeting with NRR to discuss the industry response to the requirement to demonstrate the ultrasonic testing (UT) leak path technique as set forth in 10CFR50.55a) dated September 10, 2008. At this meeting, the PWROG presented their program to develop a technical justification in accordance with ASME V Article 14 and that EPRI would perform an independent review of the technical justification document. In addition, EPRI agreed to augment the blind testing requirement for ultrasonic testing data analyst personnel with leak path samples. A commitment was made that the PWROG technical justification report and the EPRI review would be provided to the NRC. The blind testing of data analysts is currently underway and does include leak path test samples.

This letter transmits four (4) proprietary and two (2) non-proprietary copies of Technical Justification Document 51-9131378-002/003, “Technical Justification for Detection of Leak Path Indications in Reactor Pressure Vessel Upper Head Penetrations” developed by AREVA NP under PA-MSC-0532 and EPRI letter MRP 2010-057. These documents are being submitted for information only. As such, no Safety Evaluation (SE) is expected, therefore, no review fees should be incurred.

Designated as original 12/30/2016

Jonathan Rowley

Jonathan Rowley

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NRR

AREVA NP document 51-9131378-002 contains information proprietary to AREVA NP, Inc; it is supported by an affidavit signed by AREVA NP, owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (a)(4) of Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that this information which is proprietary to AREVA NP be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

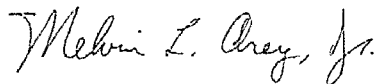
Correspondence with respect to the copyright or proprietary aspects of the information listed above or supporting AREVA NP affidavit should be addressed to Gayle F. Elliott, Product Licensing Manager, AREVA NP, Inc., P.O. Box 10935, Lynchburg, Virginia 24506-0935.

Correspondence related to this transmittal should be addressed to:

Mr. Alan Thomas  
AREVA NP, Inc.  
P. O. Box 10935  
Lynchburg, Virginia 24506-0935.

If you have any questions, please do not hesitate to contact me at (704) 382-8619 or Mr. Alan Thomas at AREVA NP, Inc. at (434) 832-2989.

Sincerely yours,



Melvin L. Arey, Jr., Chairman  
PWROG Owners Group

MLA:JPM:las

Enclosures:

1. Four (4) proprietary copies of Technical Justification Document, 51-9131378-002, "Technical Justification for Detection of Leak Path Indications in Reactor Pressure Vessel Upper Head Penetrations".
2. Two (2) non-proprietary copies of Technical Justification Document, 51-9131378-003, "Technical Justification for Detection of Leak Path Indications in Reactor Pressure Vessel Upper Head Penetrations".
3. One (1) copy of Affidavit.

cc: PWROG Management Committee      B. Thigpen, AREVA NP  
PWROG Steering Committee      M. Key, AREVA NP  
PWROG Materials Subcommittee      M. Hacker, AREVA NP  
PWROG Licensing Subcommittee      A. Thomas, AREVA NP  
PWROG PMO      M. DeVan, AREVA NP  
J. Rowley, USNRC      T. McAlister, SCE&G  
T. Chan, USNRC      J. Spanner, EPRI



September 24, 2010  
AREVA-10-02763

Mr. Anthony Nowinowski  
Manager, Owners Group Program Management Office  
Westinghouse Electric Company  
Mail Stop ECE 5-16  
P.O. Box 355  
Pittsburgh, PA 15230-0355

**Subject: Transmittal of the Technical Justification Documents 51-9131378-002/003,  
"Technical Justification for Detection of Leak Path Indications in Reactor  
Pressure Vessel Upper Head Penetrations," PA-MS-C-0532**

Dear Mr. Nowinowski:

This letter provides the AREVA NP final deliverable reports for PA-MS-C-0532. These reports are titled "Technical Justification for Detection of Leak Path Indications in Reactor Pressure Vessel Upper Head Penetrations" and are identified as AREVA NP document 51-9131378-002 (AREVA NP proprietary version) and AREVA NP document 51-9131378-003 (AREVA NP non-proprietary version).

In accordance with the PA-MS-C-0532 workscope, it is understood that these documents are to be transmitted to the NRC for information. Because AREVA NP document 51-9131378-002 contains information proprietary to AREVA NP, Inc; an affidavit has been prepared and signed by AREVA NP, and is attached to this letter. This affidavit shall accompany the documents in the transmittal to the NRC by the PWROG.

If there are any questions, please contact me at 434-832-3160 or [matt.devan@areva.com](mailto:matt.devan@areva.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt DeVan'.

Matthew J. DeVan  
Project Development Manager  
AREVA NP, Inc.

**AREVA NP INC**

3315 Old Forest Road, P.O. Box 10935, Lynchburg, VA 24506-0935  
Tel.: (434) 832-3000 - Fax: (434) 832-3840 [www.areva.com](http://www.areva.com)

September 24, 2010  
AREVA-10-02763

Attachment

C:

A. Thomas	AREVA NP
B. Thigpen	AREVA NP
M. Hacker	AREVA NP
M. Key	AREVA NP
J. Cirilli	Exelon
J. Molkenthin	Westinghouse

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A F F I D A V I T

COMMONWEALTH OF VIRGINIA    )  
   ) ss.  
 CITY OF LYNCHBURG                )

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA NP Inc. (AREVA NP) and as such I am authorized to execute this Affidavit.
  
2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.
  
3. I am familiar with the AREVA NP information contained in Engineering Information Record 51-9131378-002 entitled, "Technical Justification for Detection of Leak Path Indications in Reactor Pressure Vessel Upper Head Penetrations," dated July 2010, and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.
  
4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.
  
5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

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 NP to determine whether information should be classified as proprietary:


- (a) The information reveals details of AREVA NP'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 NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

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

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

8. AREVA NP 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.

A handwritten signature in cursive script, written over a horizontal line.

SUBSCRIBED before me this 24<sup>th</sup>  
day of September 2010.

A handwritten signature in cursive script, written over a horizontal line.

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/10  
Reg. # 7079129

