



**KHNP**

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February 10, 2017  
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-17-0040L

**Subject: Revised Response to RAI 274-8277 for Question 07.01-40**

**References: 1) NRC Request for Additional Information 274-8277, dated October 27, 2015**  
**2) KHNP Letter MKD/NW-15-0398L, Response to RAI 274-8277 for Questions on a 45-Day Response Cycle, dated December 29, 2015**  
**3) KHNP Letter MKD/NW-16-1055L, Supplemental Response to RAI 274-8277 for Question 07.01-40, dated October 26, 2016**

KHNP is hereby submitting a revised response to RAI 274-8277, dated October 27, 2015. The RAI revised response addresses Question 07.01-40 and corrects the input to CPP2A in the diagram for the control element assembly position and penalty factor movement.

Enclosure 1 contains a copy of the associated affidavit. Enclosure 2 provides the revised response to RAI 274-8277 for Question 07.01-40 (Proprietary). Enclosure 3 provides the revised response to RAI 274-8277 for Question 07.01-40 (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  
Director  
Advanced Reactors Development Laboratory  
Korea Hydro & Nuclear Power Co., Ltd.

Enclosures:

1. Affidavit KAW-17-0040
2. Revised Response to RAI 274-8277 for Question 07.01-40 (Proprietary)
3. Revised Response to RAI 274-8277 for Question 07.01-40 (Non-Proprietary)

## **Enclosure 1**

### **Affidavit KAW-17-0040**

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 274-8277 for Question 07.01-40 (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 February 10, 2017.



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

**Enclosure 2**

Revised Response to RAI 274-8277 for Question 07.01-40

(Proprietary)

February 10, 2017

**Enclosure 3**

Revised Response to RAI 274-8277 for Question 07.01-40

(Non-Proprietary)

February 10, 2017