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July 18, 2018  
Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Mr. William Ward  
Division of New Reactor Licensing

Docket No. 52-046  
MKD/NW-18-0096L

**Subject: Submittal of Revised Technical Reports for APR1400 Design Certification**

**References:**

- 1. KHNP Letter MKD/NW-18-0027L, Submittal of Updated Technical Reports, dated February 13, 2018**
- 2. KHNP Letter MKD/NW-18-0078L, Revised Response to RAI 301-8280 for the Question 07.01-45 (Rev.2), dated May 25, 2018**
- 3. KHNP Letter MKD/NW-17-0071L, Submittal of Revised Technical Reports for APR1400, dated March 17, 2017**
- 4. KHNP Letter MKD/NW-18-0084L, Revised Response to RAI 201-8063 for the Question 19.04-15 (Rev.1), dated June 4, 2018**

The purpose of this letter is to transmit two sets of revised technical reports for APR1400 Design Certification. The first set is related to the CPC Setpoint Analysis Methodology for APR1400 report previously submitted by Reference 1 which has been updated to incorporate recent RAI response mark-ups as presented in Reference 2. The second set is associated with the Loss of Large Area Analysis Report previously submitted by Reference 3 which has been updated to include the part of power source for the beyond design basis external event as provided in Reference 4.

Enclosure 1 provides the supporting affidavit for the proprietary version of the CPC setpoint analysis technical report. Enclosures 2 and 3 provide electronic copies of the Proprietary and Non-proprietary versions of the technical report for the CPC Setpoint Analysis Methodology, respectively. Enclosures 4 and 5 provide electronic copies of the SRI (Security Related Information) and Non-SRI versions of the Loss of Large Area Analysis Report, respectively.

If additional information or clarification 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,

Yun-ho Kim  
Project Manager  
Advanced Reactors Development Laboratory  
Korea Hydro & Nuclear Power Co., Ltd.

Enclosures:

1. Affidavit KAW-18-0096
2. CPC Setpoint Analysis Methodology for APR1400 (Proprietary) (APR1400-F-C-NR-14001-P, Rev.3)
3. CPC Setpoint Analysis Methodology for APR1400 (Non-Proprietary) (APR1400-F-C-NR-14001-NP, Rev.3)
4. Loss of Large Area Analysis Report (Security Related Information) (APR1400-E-P-NR-14004-P, Rev.2)
5. Loss of Large Area Analysis Report (Non-Security Related Information) (APR1400-E-P-NR-14004-NP, Rev.2)

## Enclosure 1

### Affidavit KAW-18-0096

I, Jeong-kwan Suh, 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, APR1400-F-C-NR-14001-P, 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 July 18, 2018



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Jeong-kwan Suh  
General Manager  
APR1400 Licensing Team  
Korea Hydro and Nuclear Power Co., Ltd

**Enclosure 2**

APR1400-F-C-NR-14001-P, Rev.3

CPC Setpoint Analysis Methodology for APR1400

(Proprietary)

## **Enclosure 3**

APR1400-F-C-NR-14001-NP, Rev.3

CPC Setpoint Analysis Methodology for APR1400

(Non-proprietary)

**Enclosure 4**

APR1400-E-P-NR-14004-P, Rev.2  
Loss of Large Area Analysis Report  
(Security Related Information)

**Enclosure 5**

APR1400-E-P-NR-14004-NP, Rev.2

Loss of Large Area Analysis Report

(Non-Security Related Information)