



**~~SAFEGUARDS INFORMATION~~**

February 3, 2012  
NRC:12:007

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

**Submittal of ANP-10295P, "AREVA NP U.S. EPR Security Features Technical Report,"  
Revision 3**

AREVA NP Inc. (AREVA NP) is submitting the enclosed revision to ANP-10295P, "AREVA NP U.S. EPR Security Features Technical Report," previously transmitted by References 1, 2, and 3 in support of the final response to RAI 491, Supplement 3. This report contains Safeguards Information.

AREVA NP considers some of the material contained in the enclosures to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the document are provided on the enclosed CD. Both versions of the document should be controlled as Safeguards Information.

If you have any questions related to this submittal, please contact me. I may be reached by telephone at 434-832-2369 or by e-mail at [pedro.salas@areva.com](mailto:pedro.salas@areva.com).

Sincerely,

A handwritten signature in dark ink, appearing to read 'Pedro Salas', is written over the typed name.

Pedro Salas, Manager  
Corporate Regulatory Affairs  
AREVA NP Inc.

Enclosures

c: G: Tesfaye  
Docket No. 52-020

The attachment to this letter contains safeguards information. Upon separation from the attachment, this letter is decontrolled.

**~~SAFEGUARDS INFORMATION~~**

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References

- Ref. 1: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of ANP-10295, 'AREVA NP U.S. EPR Security Features Technical Report'," NRC:08:095, December 5, 2008.
- Ref. 2: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of ANP-10295, 'AREVA NP U.S. EPR Security Features Technical Report,' Revision 1," NRC:09:112, October 28, 2009.
- Ref. 3: Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of ANP-10295, 'AREVA NP U.S. EPR Security Features Technical Report,' Revision 2," NRC:11:097, November 8, 2011.

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA            )  
  ) ss.  
COUNTY OF CAMPBELL                 )

1. My name is Russell D. Wells. I am U.S. EPR COLA Licensing Manager for AREVA NP Inc. 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 Submittal of ANP-10295P, 'AREVA NP U.S. EPR Security Features Technical Report,' Revision 3," 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 paragraph 6(c) above.

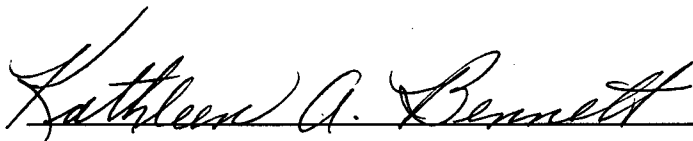
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited 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, reading "Russell Wedel", written over a horizontal line.

SUBSCRIBED before me this  
day of February, 2012.

A handwritten signature in cursive script, reading "Kathleen A. Bennett", written over a horizontal line.

Kathleen A. Bennett  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/2015  
Registration No. 110864

