

October 29, 2014 NRC:14:057

U.S. Nuclear Regulatory Commission Document Control Desk 11555 Rockville Pike Rockville, MD 20852

Submittal of AREVA Inc. Technical Report ANP-10318P, "Pipe Rupture External Loading Effects on U.S. EPR™ Essential Structures, Systems, and Components," Revision 3

Ref. 1: Letter, Pedro Salas (AREVA Inc.) to Document Control Desk (NRC), "Closure Plan for U.S. EPR Design Certification Application – FSAR Group B and Group C Chapters," NRC: 14:054, September 30, 2014.

This submittal provides the NRC with Revision 3 of the AREVA Inc. (AREVA) Technical Report ANP-10318P, "Pipe Rupture External Loading Effects on U.S. EPR™ Essential Structures, Systems, and Components," as identified in Reference 1. This technical report describes the AREVA methodology used to conservatively calculate the external loading effects on essential structures, systems, and components (SSCs) due to jet impingement, including unsteadiness and potential blast effects. This revision to the technical report removes Reference 9, "ANP-10264NP-A, U.S. EPR Piping Analysis and Pipe Support Design Topical Report." The content of Reference 9 was incorporated into Revision 6 of the U.S. EPR FSAR as Appendix 3F. The changes to ANP-10318P are depicted in the "Nature of Changes" section of the technical report. These changes are administrative in nature and should not require an additional technical review.

AREVA will incorporate the revision to ANP-10318P, by reference, into U.S. EPR FSAR, Revision 8, which is currently scheduled for 2015. AREVA requests that the NRC incorporate the review of this revised report into the evaluation of U.S. EPR FSAR Tier 2, Chapter 3 for the U.S. EPR Safety Evaluation Report, in a manner consistent with other reports that are incorporated by reference into the U.S. EPR FSAR.

AREVA considers some of the information contained in the enclosed documents 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 technical report are enclosed.



If you have any questions related to this information, please contact Len Gucwa by telephone at (434) 832-3466, or by e-mail at Len.Gucwa.ext@areva.com.

Pedro Salas, Director

**Regulatory Affairs** 

AREVA Inc.

Sincerely,

cc:

G. F. Wunder

J. P. Segala

Docket 52-020

## **Enclosures:**

- 1. Proprietary version of Technical Report ANP-10318P, "Pipe Rupture External Loading Effects on U.S. EPR™ Essential Structures, Systems, and Components," Revision 3
- 2. Non-Proprietary version of Technical Report ANP-10318P, "Pipe Rupture External Loading Effects on U.S. EPR™ Essential Structures, Systems, and Components," Revision 3
- 3. Notarized Affidavit

## **AFFIDAVIT**

COMMONWEALTH OF VIRGINIA	)	SS
CITY OF LYNCHBURG	)	

- My name is Gayle Elliott. I am Manager, Product Licensing, for AREVA Inc.
   (AREVA) and as such I am authorized to execute this Affidavit.
- I am familiar with the criteria applied by AREVA to determine whether certain
   AREVA information is proprietary. I am familiar with the policies established by
   AREVA to ensure the proper application of these criteria.
- 3. I am familiar with the AREVA information contained in the document ANP10318P, "Pipe Rupture External Loading Effects on U.S. EPR™ Essential Structures, Systems,
  and Components, Revision 3," dated October 2014 and referred to herein as "Document."
  Information contained in this Document has been classified by AREVA as proprietary in
  accordance with the policies established by AREVA Inc. 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 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 to determine whether information should be classified as proprietary:
  - (a) The information reveals details of AREVA'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.
  - (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
  - (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

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

- 7. In accordance with AREVA'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 only as required and under suitable agreement providing for nondisclosure and limited use of the information.
- 8. AREVA 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.

SUBSCRIBED before me this \_\_

Sherry L. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA MY COMMISSION EXPIRES: 10/31/14

Reg. # 7079129