



**Westinghouse
Electric Company**

Box 355
Pittsburgh Pennsylvania 15230-0355

February 18, 2002
LTR-NRC-02-8

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Attention: J. S. Wermiel, Chief
Reactor Systems Branch
Division of Systems Safety and Analysis

Subject: Issuance of Approved Version of WCAP-12488-A, Addendum 1-A Revision 1 / WCAP-14204-A,
Addendum 1-A Revision 1 of Westinghouse Fuel Criteria Evaluation Process, "Revision to Design
Criteria," (Proprietary / Non-proprietary)

Dear Mr. Wermiel:

Enclosed are copies of the Approved Version of WCAP-12488-A, Addendum 1-A Revision 1 / WCAP-14204-A,
Addendum 1-A Revision 1 of Westinghouse Fuel Criteria Evaluation Process, "Revision to Design Criteria,"
(Proprietary / Non-proprietary).

Also enclosed are:

1. One (1) copy of the Application for Withholding, AW-02-1512 with Proprietary Information Notice and Copyright Notice.
2. One (1) copy of Affidavit, AW-02-1512.

This submittal contains Westinghouse proprietary information of trade secrets, commercial or financial information which we consider privileged or confidential pursuant to 10 CFR 9.17(a)(4). Therefore, it is requested that the Westinghouse proprietary information attached hereto be handled on a confidential basis and be withheld from public disclosure.

This material is for your internal use only and may be used solely for the purpose for which it is submitted. It should not be otherwise used, disclosed, duplicated, or disseminated, in whole or in part, to any other person or organization outside the Office of Nuclear Reactor Regulation without the expressed prior written approval of Westinghouse.

1007 1/5 Prop
5 Non-Prop

Correspondence with respect to any Application for Withholding should reference AW-02-1512 and should be addressed to H. A. Sepp, Manager of Regulatory and Licensing Engineering, Westinghouse Electric Company, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,

A handwritten signature in black ink, appearing to read 'H. A. Sepp', with a stylized flourish at the end.

Henry A. Sepp, Manager
Regulatory and Licensing Engineering

Copy to:
S. L. Wu, NRR
R. Caruso, NRR
M. Scott, NRR



**Westinghouse
Electric Company**

Box 355
Pittsburgh Pennsylvania 15230-0355

February 18, 2002
AW-02-1512

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Attention: J. S. Wermiel, Chief,
Reactor Systems Branch
Division of Systems Safety and Analysis

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Issuance of Approved Version of WCAP-12488-A, Addendum 1-A Revision 1 / WCAP-14204-A, Addendum 1-A Revision 1 of Westinghouse Fuel Criteria Evaluation Process, "Revision to Design Criteria," (Proprietary / Non-proprietary)

Reference: Letter from H. A. Sepp to J. S. Wermiel, LTR-NRC-02-8, dated February 18, 2002

Dear Mr. Wermiel:

The application for withholding is submitted by Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse"), pursuant to the provisions of paragraph (b)(1) of Section 2.790 of the Commission's regulations. It contains commercial strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary material for which withholding is being requested is identified in the proprietary version of the subject report. In conformance with 10 CFR Section 2.790, Affidavit AW-02-1512 accompanies this application for withholding, setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

Correspondence with respect to this application for withholding or the accompanying affidavit should reference AW-02-1512 and should be addressed to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read 'H. Sepp', written in a cursive style.

Henry A. Sepp, Manager
Regulatory and Licensing Engineering

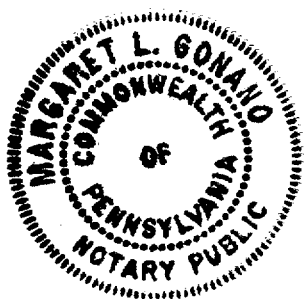
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Henry A. Sepp, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse") and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



A handwritten signature of Henry A. Sepp in black ink.

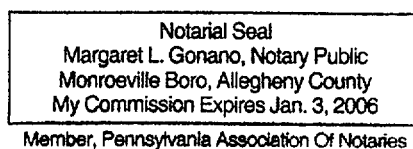
Henry A. Sepp, Manager

Regulatory and Licensing Engineering

Sworn to and subscribed
before me this 18th day
of February, 2002.

A handwritten signature of Margaret L. Gonano in black ink.

Notary Public



- (1) I am Manager, Regulatory and Licensing Engineering, in the Nuclear Services, of the Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse") and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Electric Company.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.790 of the Commission's regulations and in conjunction with the Westinghouse application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by the Westinghouse Electric Company in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.

- (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
- (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.
- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
 - b) It is information which is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
 - c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.
 - (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.790, it is to be received in confidence by the Commission.
 - (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.

- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked "Issuance of Approved Version of WCAP-12488-A, Addendum 1-A Revision 1 / WCAP-14204-A, Addendum 1-A Revision 1 of Westinghouse Fuel Criteria Evaluation Process, 'Revision to Design Criteria,' (Proprietary / Non-proprietary)" February 18, 2002, for submittal to the Commission, being transmitted by Westinghouse Electric Company (W) letter (LTR-NRC-02-8) and Application for Withholding Proprietary Information from Public Disclosure, Henry A. Sepp, Westinghouse, Manager Regulatory and Licensing Engineering to the attention of J. S. Wermiel, Chief, Reactor Systems Branch, Division of Systems Safety and Analysis. The proprietary information as submitted by Westinghouse Electric Company is that associated with the approved version of WCAP-12488-A, Addendum 1-A Revision 1 / WCAP-14204-A, Addendum 1-A Revision 1 (Proprietary/Non-proprietary).

This information is part of that which will enable Westinghouse to:

- (a) The proposed criteria replace indirect performance correlations with direct performance correlations that are more readily measured and provide direct feedback to design.
- (b) The revised criteria conform to both NUREG-0800 and to current industry guidelines.
- (c) These updated criteria will promote convergence between Westinghouse business units.

Further this information has substantial commercial value as follows:

- (a) Westinghouse can continue to ensure the highest quality of fuel since the proposed criteria is more readily measurable and thus provides direct feedback to fuel designs.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended for developing the enclosed improved core thermal performance methodology.

Further the deponent sayeth not.

Proprietary Information Notice

Transmitted herewith are proprietary and non-proprietary versions of documents furnished to the NRC. In order to conform to the requirements of 10 CFR 2.790 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.790(b)(1).

Copyright Notice

The documents transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies for the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.790 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond these necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

Westinghouse Non-Proprietary Class 3



**WCAP-14204-A
Addendum 1-A
Revision 1**

Addendum 1 to WCAP-14204-A Revision to Design Criteria

**Westinghouse Electric Company LLC
Nuclear Fuel**



Addendum 1 to WCAP-14204-A

Revision to Design Criteria

February 2001 (Original)

August 2001 (Revision 1)

January 2002 (Approved)

Table of Content

<u>Section</u>	<u>Description</u>
A	Letter from Richards, S. A. (NRC) to Sepp, H. A. (Westinghouse), "Safety Evaluation for the Closeout of Topical Report WCAP-12488-A, Addendum 1, Revision 1, "Westinghouse Fuel Criteria Evaluation Process," November 21, 2000
B	Letter from Sepp, H. A. (Westinghouse) to Wermiel, J. S. (NRC), "Addendum 1 to WCAP-12488-A / WCAP-14204-A, 'Westinghouse Fuel Criteria Evaluation Process' (Proprietary/Non-Proprietary)," NSBU-NRC-01-5983, February 19, 2001. [Base report not included since it was superceded by Revision 1. Refer to Section C for report with RAIs incorporated.]
C	Letter from Sepp, H. A. (Westinghouse) to Wermiel, J. S. (NRC), "Revision 1 to Addendum 1 of WCAP-12488-A / WCAP-14204-A, 'Westinghouse Fuel Criteria Evaluation Process' (Proprietary/Non-Proprietary)," LTR-NRC-01-23, August 6, 2001. [Base report with RAIs incorporated.]
D	Letter from Galembush, J. S. (Westinghouse) to Wermiel, J. S. (NRC), "Response to Request for Additional Information Regarding 'Addendum 1 Revision 1 of WCAP-12488-A / WCAP-14204-A, 'Westinghouse Fuel Criteria Evaluation Process' (Proprietary/Non-Proprietary)," LTR-NRC-01-37, October 29, 2001. [RAI responses only. Refer to Section C for copy of base report with RAIs incorporated.]

Section A

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001



November 21, 2001

Mr. H. A. Sepp, Manager
Regulatory and Licensing Engineering
Westinghouse Electric Company
Energy Center Complex
Northern Pike
Monroeville, PA 15146

SUBJECT: SAFETY EVALUATION FOR THE CLOSEOUT OF TOPICAL REPORT
WCAP-12488-A, ADDENDUM 1, REVISION 1, "WESTINGHOUSE FUEL
CRITERIA EVALUATION PROCESS"

Dear Mr. Sepp:

By letter dated August 6, 2001, and a revised letter dated October 29, 2001, Westinghouse Electric Company (Westinghouse) submitted Topical Report WCAP-12488-A, Addendum 1, Revision 1, "Westinghouse Fuel Criteria Evaluation Process" for NRC staff review. The review considered replacement of the hydrogen pickup limit criterion for fuel assembly components, excluding cladding, with a new criterion based on the stress level consistent with American Society of Mechanical Engineers (ASME) Code Section III requirements after accounting for thinning due to corrosion.

The staff has completed its review of the subject topical report and finds it acceptable for referencing in licensing applications to the extent specified and under the limitations delineated in the report and in the associated safety evaluation (SE). The SE defines the basis for acceptance of the report.

Pursuant to 10 CFR 2.790, we have determined that the enclosed SE does not contain proprietary information. However, we will delay placing the SE in the public document room for a period of ten working days from the date of this letter to provide you with the opportunity to comment on the proprietary aspects only. If you believe that any information in the enclosure is proprietary, please identify such information line by line and define the basis pursuant to the criteria of 10 CFR 2.790.

We do not intend to repeat our review of the matters described in the subject report, and found acceptable, when the report appears as a reference in license applications, except to ensure that the material presented applies to the specific plant involved. Our acceptance applies only to matters approved in the report.

In accordance with procedures established in NUREG-0390, the NRC requests that Westinghouse publish an accepted version, within 3 months of receipt of this letter. The accepted version shall incorporate (1) this letter and the enclosed SE between the title page and the abstract, and (2) an "-A" (designating "accepted") following the report identification symbol.

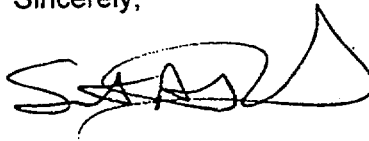
Should our criteria or regulations change so that our conclusions as to the acceptability of the report are invalidated, Westinghouse and/or the applicants referencing the TR will be expected

H. A. Sepp

-2-

to revise and resubmit their respective documentation, or submit justification for the continued applicability of the TR without revision of their respective documentation.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Richards', with a stylized, sweeping flourish at the end.

Stuart A. Richards, Director
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Project No. 700

Enclosure: Safety Evaluation

cc w/encl:

Mr. Andrew Drake, Project Manager
Westinghouse Owners Group
Westinghouse Electric Corporation
Mail Stop ECE 5-16
P.O. Box 355
Pittsburgh, PA 15230-0355



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

TOPICAL REPORT WCAP-12488-A, ADDENDUM 1, REVISION 1,

"WESTINGHOUSE FUEL CRITERIA EVALUATION PROCESS"

WESTINGHOUSE ELECTRIC COMPANY

PROJECT NO. 700

1.0 INTRODUCTION

In a letter dated August 6, 2001, Westinghouse Electric Company (Westinghouse) submitted to the NRC Revision 1 to Addendum 1 of WCAP-12488-A, entitled "Westinghouse Fuel Criteria Evaluation Process." WCAP-12488-A is an approved topical report that describes a process and criteria for Westinghouse to apply to changes or improvements in existing fuel designs that will not require NRC review and prior approval when these criteria are met. The submittal revises one fuel licensing criterion to be consistent with current industry guidelines. Specifically, Westinghouse proposes to replace the hydrogen limit criterion of fuel assembly structural components, excluding fuel rods, with a stress criterion that is consistent with the American Society of Mechanical Engineers (ASME) Code Section III requirements after taking into account material thinning due to corrosion. The structural components of a fuel assembly mainly include grid spacers and thimble tubes.

Westinghouse also intended to use a generic term "zircaloy" to apply to both Zircaloy-4 and ZIRLO. In Topical Report WCAP-12610-P-A, entitled "VANTAGE+ Fuel Assembly Reference Core Report," the staff approved the use of ZIRLO for cladding and assembly structural components, and specifically mentioned that ZIRLO is an advanced material different from Zircaloy-4. In addition, the staff recognized that ZIRLO is a patented trade name for Westinghouse with distinguishable chemical compositions from Zircaloy-4. Thus, the staff disagreed with Westinghouse's request to combine ZIRLO and Zircaloy-4 with one generic name that could be misleading and create confusion among the NRC staff, licensees, and members of the public. In a revised submittal dated October 29, 2001, Westinghouse withdrew the request and now references Zircaloy-4 and ZIRLO individually. Thus, the staff agreed with the approach of referring to zircaloy and ZIRLO separately.

2.0 EVALUATION

During reactor operation, fuel assemblies, including cladding and structural components, will absorb significant amounts of hydrogen to form zirconium hydride platelets. These platelets could reduce the ductility due to hydrogen embrittlement. In order to preclude the loss of ductility, Westinghouse restricted the hydrogen pickup to a certain level through the fuel assembly lifetime. However, this criterion for hydrogen content was based on old, unirradiated Zircaloy-4 data. Westinghouse pointed out that recent data for Zircaloy-4 and ZIRLO materials indicated that ductility does not drop drastically and some ductility remains even with the hydrogen concentration higher than the criterion prescribed. Although irradiation reduces the

material ductility, it also increases the material yield and ultimate tensile strengths. The hydrogen pickup criterion does not take into account this aspect of material strength. Thus, Westinghouse claimed that analyses of irradiated structural components should account for changes in ductility and material strength due to hydrogen pickup and irradiation effects. Westinghouse does not intend to change the hydrogen pickup limit for cladding.

Westinghouse performed tensile tests for grid strap material and assembly thimble tubes. The tests included unirradiated samples at room and elevated temperatures. Some samples were charged with high hydrogen concentration. The results of ductility, yield strength, and ultimate tensile strength were analyzed and compared with the irradiated material properties. The analyses confirmed that the ductility decreases gradually with increasing hydrogen concentration, and a significant amount of ductility exists at operating temperatures and high hydrogen content. The analyses also confirmed that yield and ultimate tensile strengths of irradiated materials are still much higher than those of unirradiated materials. The staff has reviewed these tests and agrees that the analyses are acceptable.

In addition, Westinghouse tested the grid crush strength for seismic and loss-of-coolant accident (LOCA) events as recommended by Standard Review Plan Section 4.2, Appendix A. The grid samples were conditioned in autoclaves with combined effects of oxidation, wall thinning, hydrogen pickup, and deformed grid cells. The results showed that the grid crush strength does not change appreciably from the unirradiated material properties. Westinghouse concluded that the grid crush data from unirradiated grids are still applicable for seismic and LOCA analyses. The staff has reviewed the tests and agrees that the results are acceptable.

Based on these tests and analyses, Westinghouse asserts that the current criterion of using a hydrogen pickup limit for structural components is difficult to verify and does not conform to industry guidelines. The staff agrees with this assessment that structural components other than cladding can be analyzed more adequately using criteria based on mechanical properties such as stress, strain, and material strength.

3.0 CONCLUSION

The staff has reviewed the Westinghouse submittal to replace the hydrogen pickup limit criterion for fuel assembly structural components, excluding cladding, with a new criterion based on the stress level consistent with the ASME Code Section III requirements after taking into account thinning due to corrosion. Based on the available tests and adequate analyses, the staff approves the proposed new criterion for structural components of fuel assemblies in Revision 1 to Addendum 1 of WCAP-12488-A.

Principle Contributor: S. Wu

Date: November 21, 2001

Section B



Westinghouse
Electric Company

Box 355
Pittsburgh Pennsylvania 15230-0355

February 19, 2001
NSBU-NRC-01-5983

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Attention: J. S. Wermiel, Chief
Reactor Systems Branch
Division of Systems Safety and Analysis

Subject: Addendum 1 to WCAP-12488-A / WCAP-14204-A, "Westinghouse Fuel Criteria Evaluation Process," (Proprietary / Non-proprietary)

Dear Mr. Wermiel:

Enclosed are five copies of the Proprietary and Non-Proprietary versions of Addendum 1 to WCAP-12488-A / WCAP-14204-A, "Westinghouse Fuel Criteria Evaluation Process," being submitted for review and approval.

Also enclosed are:

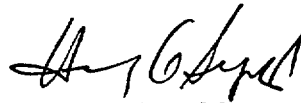
1. One (1) copy of the Application for Withholding, AW-01-1437 with Proprietary Information Notice and Copyright Notice.
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Correspondence with respect to any Application for Withholding should reference AW-01-1437 and should be addressed to H. A. Sepp, Manager of Regulatory and Licensing Engineering, Westinghouse Electric Company, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,

A handwritten signature in dark ink, appearing to read "H. A. Sepp", written in a cursive style.

Henry A. Sepp, Manager
Regulatory and Licensing Engineering

Copy to:
S. L. Wu, NRR
R. Caruso, NRR
M. S. Chatterton, NRR
R. Wharton, NRR
S. Bloom, NRR



Westinghouse
Electric Company

Box 355
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February 19, 2001
AW-01-1437

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Attention: J. S. Wermiel, Chief,
Reactor Systems Branch
Division of Systems Safety and Analysis

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Addendum 1 to WCAP-12488-A / WCAP-14204-A, "Westinghouse Fuel Criteria Evaluation Process," (Proprietary / Non-proprietary)

Reference: Letter from H. A. Sepp to J. S. Wermiel, NSBU-NRC-01-5983, dated February 19, 2001

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Accordingly, it is respectfully requested that the subject information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

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Very truly yours,

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Henry A. Sepp, Manager
Regulatory and Licensing Engineering

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

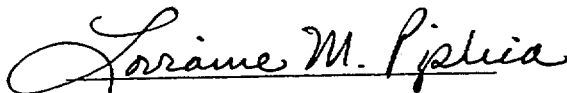
Before me, the undersigned authority, personally appeared Henry A. Sepp, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse") and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



Henry A. Sepp, Manager

Regulatory and Licensing Engineering

Sworn to and subscribed

before me this 20th dayof February, 2001.

Notary Public



Notarial Seal
Lorraine M. Piplica, Notary Public
Monroeville Boro, Allegheny County
My Commission Expires Dec. 14, 2003
Member, Pennsylvania Association of Notaries

- (1) I am Manager, Regulatory and Licensing Engineering, in the Nuclear Services Division, of the Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse") and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Electric Company.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.790 of the Commission's regulations and in conjunction with the Westinghouse application for withholding accompanying this Affidavit.
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- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
 - b) It is information which is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
 - c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.
 - (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.790, it is to be received in confidence by the Commission.
 - (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.

- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked "Addendum 1 to WCAP-12488-A / WCAP-14204-A, "Westinghouse Fuel Criteria Evaluation Process , (Proprietary / Non-proprietary)," February 19, 2001, for submittal to the Commission, being transmitted by Westinghouse Electric Company (W) letter (NSBU-NRC-01-5983) and Application for Withholding Proprietary Information from Public Disclosure, Henry A. Sepp, Westinghouse, Manager Regulatory and Licensing Engineering to the attention of J. S. Wermiel, Chief, Reactor Systems Branch, Division of Systems Safety and Analysis. The proprietary information as submitted by Westinghouse Electric Company is Addendum 1 to WCAP-12488-A / WCAP-14204-A which provides revisions to certain design criteria. This submittal is a follow-up to a presentation given to the NRC staff on October 17, 2000.

This information is part of that which will enable Westinghouse to:

- (a) The proposed criteria replace indirect performance correlations with direct performance correlations that are more readily measured and provide direct feedback to design.
- (b) The revised criteria conform to both NUREG-0800 and to current industry guidelines.
- (c) These updated criteria will promote convergence between Westinghouse business units.

Further this information has substantial commercial value as follows:

- (a) Westinghouse can continue to ensure the highest quality of fuel since the proposed criteria is more readily measurable and thus provides direct feedback to fuel designs.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended for developing the enclosed improved core thermal performance methodology.

Further the deponent sayeth not.

Proprietary Information Notice

Transmitted herewith are proprietary and non-proprietary versions of documents furnished to the NRC. In order to conform to the requirements of 10 CFR 2.790 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.790(b)(1).

Copyright Notice

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Section C



Westinghouse
Electric Company

Box 355
Pittsburgh Pennsylvania 15230-0355

August 6, 2001
LTR-NRC-01-23

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Attention: J. S. Wermiel, Chief
Reactor Systems Branch
Division of Systems Safety and Analysis

Subject: Revision 1 to Addendum 1 of WCAP-12488-A / WCAP-14204-A, "Westinghouse Fuel Criteria Evaluation Process," (Proprietary / Non-proprietary)

Dear Mr. Wermiel:

This submittal supersedes Revision 0 to Addendum 1 of WCAP-12488-A/WCAP-14204-A, previously submitted by Westinghouse via NSBU-NRC-01-5983, dated 2/19/01.

Enclosed are five copies of the Proprietary and Non-Proprietary versions of Revision 1 to Addendum 1 of WCAP-12488-A / WCAP-14204-A, "Westinghouse Fuel Criteria Evaluation Process," being submitted for review and approval.

Also enclosed are:

1. One (1) copy of the Application for Withholding, AW-01-1475 with Proprietary Information Notice and Copyright Notice.
2. One (1) copy of Affidavit, AW-01-1475.

This submittal contains Westinghouse proprietary information of trade secrets, commercial or financial information which we consider privileged or confidential pursuant to 10 CFR 9.17(a)(4). Therefore, it is requested that the Westinghouse proprietary information attached hereto be handled on a confidential basis and be withheld from public disclosure.

This material is for your internal use only and may be used solely for the purpose for which it is submitted. It should not be otherwise used, disclosed, duplicated, or disseminated, in whole or in part, to any other person or organization outside the Office of Nuclear Reactor Regulation without the expressed prior written approval of Westinghouse.

Correspondence with respect to any Application for Withholding should reference AW-01-1475 and should be addressed to H. A. Sepp, Manager of Regulatory and Licensing Engineering, Westinghouse Electric Company, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,

A handwritten signature in black ink, appearing to read 'H. A. Sepp', written in a cursive style.

Henry A. Sepp, Manager
Regulatory and Licensing Engineering

Copy to:
S. L. Wu, NRR
R. Caruso, NRR
M. S. Chatterton, NRR
M. Scott, NRR



Westinghouse
Electric Company

Box 355
Pittsburgh Pennsylvania 15230-0355

August 6, 2001
AW-01-1475

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Attention: J. S. Wermiel, Chief,
Reactor Systems Branch
Division of Systems Safety and Analysis

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Revision 1 to Addendum 1 of WCAP-12488-A / WCAP-14204-A, "Westinghouse Fuel Criteria Evaluation Process," (Proprietary / Non-proprietary)

Reference: Letter from H. A. Sepp to J. S. Wermiel, LTR-NRC-01-23, dated July 30, 2001

Dear Mr. Wermiel:

The application for withholding is submitted by Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse"), pursuant to the provisions of paragraph (b)(1) of Section 2.790 of the Commission's regulations. It contains commercial strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary material for which withholding is being requested is identified in the proprietary version of the subject report. In conformance with 10 CFR Section 2.790, Affidavit AW-01-1475 accompanies this application for withholding, setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

Correspondence with respect to this application for withholding or the accompanying affidavit should reference AW-01-1475 and should be addressed to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "H. A. Sepp". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Henry A. Sepp, Manager
Regulatory and Licensing Engineering

Proprietary Information Notice

Transmitted herewith are proprietary and non-proprietary versions of documents furnished to the NRC. In order to conform to the requirements of 10 CFR 2.790 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.790(b)(1).

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AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

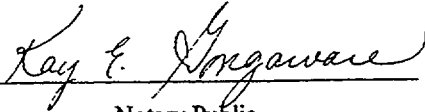
Before me, the undersigned authority, personally appeared Henry A. Sepp, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse") and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



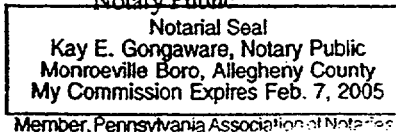
Henry A. Sepp, Manager

Regulatory and Licensing Engineering

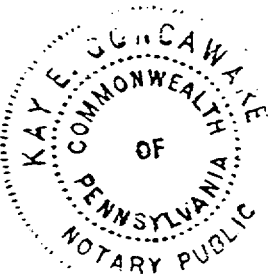
Sworn to and subscribed

before me this 6th dayof August, 2001.

Notary Public



Member, Pennsylvania Association of Notaries



- (1) I am Manager, Regulatory and Licensing Engineering, in the Nuclear Services Division, of the Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse") and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Electric Company.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.790 of the Commission's regulations and in conjunction with the Westinghouse application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by the Westinghouse Electric Company in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.
- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

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 - b) It is information which is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
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 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.790, it is to be received in confidence by the Commission.
 - (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.

- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked "Revision 1 to Addendum 1 of WCAP-12488-A / WCAP-14204-A, "Westinghouse Fuel Criteria Evaluation Process , (Proprietary / Non-proprietary)," July 30, 2001, for submittal to the Commission, being transmitted by Westinghouse Electric Company (W) letter (LTR-NRC-01-23) and Application for Withholding Proprietary Information from Public Disclosure, Henry A. Sepp, Westinghouse, Manager Regulatory and Licensing Engineering to the attention of J. S. Wermiel, Chief, Reactor Systems Branch, Division of Systems Safety and Analysis. The proprietary information as submitted by Westinghouse Electric Company is Revision 1 to Addendum 1 of WCAP-12488-A / WCAP-14204-A which provides a revision to a design criterion. This submittal is a follow-up to a presentation given to the NRC staff on October 17, 2000.

This information is part of that which will enable Westinghouse to:

- (a) The proposed criteria replace indirect performance correlations with direct performance correlations that are more readily measured and provide direct feedback to design.
- (b) The revised criteria conform to both NUREG-0800 and to current industry guidelines.
- (c) These updated criteria will promote convergence between Westinghouse business units.

Further this information has substantial commercial value as follows:

- (a) Westinghouse can continue to ensure the highest quality of fuel since the proposed criteria is more readily measurable and thus provides direct feedback to fuel designs.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended for developing the enclosed improved core thermal performance methodology.

Further the deponent sayeth not.

Addendum 1 to WCAP-14204-A
Revision to Design Criteria

Addendum 1 to WCAP-14204-A
Revision to Design Criteria

Introduction

The purpose of this submittal is to update one fuel licensing criterion that is applied to Westinghouse fuel. This criterion pre-dates NUREG-0800⁽¹⁾ and is inconsistent with other Westinghouse business units and industry guidelines. The proposed criterion replaces an indirect performance correlation with a direct performance correlation that is more readily measured and provides direct feedback to design. Both the current and proposed criterion is shown below.

<u>Parameter:</u>	Fuel Structural Hydrogen Content
<u>Current Criteria:</u>	The hydrogen content of Zircaloy-4 and ZIRLO™ structural components shall be less than [] ^{a, c} .
<u>Proposed Criteria:</u>	The Zircaloy-4 and ZIRLO™ structural component stresses will be consistent with ASME Code Section III requirements after accounting for thinning due to corrosion.

The following sections give the basis for justifying the change to the design criterion. Note: this change is only applicable to the fuel assembly structure. The criterion for fuel rod cladding remains unchanged as documented in References 2, 8, and 9.

Structural Hydrogen Criteria

The Westinghouse imposed hydrogen criteria for both cladding and structural components is defined⁽²⁾ as:

“The clad and structural component hydrogen pickup is limited to [] ^{a, c} at end of life to preclude loss of ductility due to hydrogen embrittlement by the formation of zirconium hydride platelets.”

The criterion is based on historical data for unirradiated Zircaloy-4 and ZIRLO™ which showed that hydrogen levels of [] ^{a, c} were acceptable. No differentiation was made between heated (cladding) and unheated (structural) surfaces.

Recent data for Zircaloy-4 and ZIRLO™ material shows that ductility does not suddenly decrease and that some ductility remains at hydrogen concentrations well in excess of []^{a, c}. Unheated structural components are not susceptible to hydrogen redistribution due to temperature gradients within the components. Thus, locally high hydrogen concentrations due to thermal gradients⁽¹⁰⁾⁽¹¹⁾ do not exist in structural members.

Irradiation reduces the material ductility and increases the material yield and ultimate strengths. Thus, any analysis of irradiated components should account for changes in ductility and material strength due to both irradiation and hydrogen pickup.

Effects of Hydrogen Content on Zircaloy-4 and ZIRLO™ Structural Material Properties

Westinghouse has conducted programs to collect material property data on both unirradiated and irradiated Zircaloy-4 and ZIRLO™⁽¹²⁾. Tensile test results for grid strap material and assembly thimble tubes are described below.

Tensile tests were performed on unirradiated ZIRLO™ strip material that is used to manufacture grid straps. Tests were conducted at room and elevated []^{a, b, c} temperatures. Hydrogen charging was used to give material hydrogen concentrations up to []^{a, b, c}. The ductility, defined as plastic strain or the total strain minus the elastic strain, is plotted versus hydrogen content in Figure 1. The plot shows a []^{a, b, c}. Significant ductility exists for hydrogen concentrations up to []^{a, b, c}.

Projections of the data indicate that ductility will still exist for hydrogen concentrations []^{a, b, c}.

Yield strength of the strip material is plotted versus hydrogen content in Figure 2. There is []^{a, b, c}. The ultimate strength is plotted versus the hydrogen content in Figure 3. There is []^{a, b, c}.

Tensile tests were also conducted on hydrogen charged unirradiated thimble tubes. The room temperature ductility is plotted versus the hydrogen content in Figure 4. There is []

] ^{a, b, c}. The ductility at elevated temperatures is plotted in Figure 5. These tests were conducted [

] ^{a, c} shown in Figure 5. These data illustrate that at elevated temperatures, [] ^{a, b, c} for the unirradiated ZIRLO™ thimble tubes for hydrogen concentrations [] ^{a, b, c}.

Yield and ultimate strength of the unirradiated ZIRLO™ thimble tubes are plotted versus the hydrogen content in Figures 6 and 7. There are [

] ^{a, b, c} with the hydrogen content. There is [

] ^{a, b, c} as the hydrogen content increases.

Material property data have also been obtained from irradiated Zircaloy-4 and ZIRLO™ thimble tubes. These tubes were irradiated to burnups of about [

] ^{a, c}. Sample hydrogen concentrations were [] ^{a, b, c}. The room and elevated temperature ductility are shown in Figures 8 and 9. The trends for [

] ^{a, b, c}. The minimum ductility at elevated temperatures [

] ^{a, b, c}.

The yield and ultimate strength at room and elevated temperatures are shown in Figures 10 and 11. There are [

] ^{a, b, c}. Comparisons of the data for unirradiated and irradiated ZIRLO™ thimble tubes shows that [

] ^{a, b, c}.

Comparisons of the ductility of irradiated and unirradiated Westinghouse thimble tubes at elevated temperature are shown in Figure 12. Irradiation reduces the ductility [

] ^{a, b, c}.

A survey of the literature indicates that other fuel vendors have published similar data. General Electric reports⁽³⁾ that the total and uniform elongation of irradiated Zircaloy-2 at operating temperatures are independent of the hydrogen content in the range of 0 to 815 ppm. Siemens has published⁽⁴⁾ data for the elongation after fracture of irradiated Zircaloy-4 with hydrogen contents up to 2000 ppm and concludes

that the influence of irradiation on the ductility and strength of Zircaloy-4 is dominant at both room and operating temperatures. They further conclude that even high hydrogen contents do not add to the effects of irradiation and do not have an additional influence on reducing the ductility.

The third Nuclear Fuel Industry Research Program (NFIR) sponsored a program to gather data on the properties of irradiated cladding and guide tubes. A specific objective of the program was to evaluate the decrease in ductility of Zircaloy-4 materials due to reactor irradiation and increasing hydrogen content. Both cladding and guide tube materials were included in the studies. The results of the material property measurements are reported in References 5 and 6.

Data in Reference 5 (page 4-18) illustrates that the total plastic elongation of the irradiated guide tubes decreases from about 8 % with no hydrogen present to about 0.3 % at a hydrogen concentration of about 1300 ppm. This sensitivity of ductility to the hydrogen content is somewhat greater than determined by Westinghouse, General Electric, and Siemens. Tensile strength was found to increase with the hydrogen content. Hydrogen charging was performed on unirradiated archive samples and the tensile properties were determined. The hydrogen contents of the archive samples was higher than the irradiated samples, and there was a large scatter in the data. However, it is still clear that irradiation had a much greater impact on reducing the ductility than did the hydrogen charging.

Tensile strains for both irradiated and unirradiated guide tube material at operating temperature is shown in Figure 3-15 of Reference 6. Irradiation has a much larger effect on reducing the ductility than does the hydrogen content. There is a weak dependence of ductility on the hydrogen content. Tensile strengths increase slightly with the hydrogen content.

In summary, the Westinghouse and other industry data show that:

- The ductility of unirradiated Zircaloy-4 and ZIRLO™ does not abruptly decrease above hydrogen concentrations of [] °C. There is a gradual decrease in ductility with increases in hydrogen concentrations up to [] °C. At operating temperatures, significant ductility still exists for hydrogen concentrations up to [] °C.
- The ductility of irradiated Zircaloy-4 and ZIRLO™ is primarily affected by irradiation.

- While hydrides contribute to the embrittlement of irradiated Zircaloy-4 and ZIRLO™, the []^{a, c}.
- Hydrogen content has little effect on the tensile strength of irradiated Zircaloy-4 and ZIRLO™ at either room or operating temperatures.
- The yield strength of irradiated recrystallized Zircaloy-4 and ZIRLO™ at operating temperatures is []^{a, b, c}. The value is []^{a, b, c} at room temperature.

Impacts of Hydrogen Content on Grids

Irradiation, corrosion, and hydrogen uptake could potentially impact the strength of grids. The seismic capability of grids is performed by testing them under simulated conditions. NUREG-0800⁽¹⁾ specifies that grid crush tests should be performed on unirradiated production grids at, or corrected to, operating temperature. A number of phenomena associated with irradiation could impact the seismic/LOCA capability. Westinghouse has conducted tests to verify that unirradiated production grids would continue to demonstrate the minimum seismic/LOCA capability when accounting for corrosion, wall thinning due to corrosion, hydrogen uptake, and enlargement of the grid cell size.

A series of tests were conducted⁽¹³⁾ on unirradiated 5x5 grid sections with oxidation, wall thinning, hydrogen pickup, and enlargement of the grid cell size. The test sections were conditioned by oxidizing them in autoclaves in steam and steam/lithium mixtures. Hydrogen uptake was due to oxidation of the Zircaloy-4 and ZIRLO™ material.

- One-sided oxide thickness ranged from []^{a, b, c}.
- Hydrogen content was up to []^{a, b, c}.
- Wall thinning varied from []^{a, b, c}.
- Grid spring-to-rod gaps varied from []^{a, b, c}.

The test results are illustrated in Figure 13 where the grid section crush strength is plotted versus the hydrogen content. The figure illustrates that the crush strength, P, is []

] ^{a, b, c}. The data also show that [] ^{a, b, c}. Additional evaluations showed that the crush strength and seismic capability factor were [] ^{a, b, c}.

Tests were also conducted⁽¹⁴⁾ on full size grids which had been oxidized in air to give internal strap thinning values of [] ^{a, b, c}. The cell sizes were adjusted to give [] ^{a, b, c}. Grid crush strength and stiffness data were compared to production grids with no wall thinning and with both open and closed rod-to-grid gaps. The seismic capability factor is plotted versus the percent of internal strap thinning in Figure 14. There is [] ^{a, b, c}.

These data from the grid crush tests indicate that [] ^{a, b, c}.

Evaluation of Thimble Tube Stresses

Thimble tube stresses are evaluated using Westinghouse design procedures that follow the ASME Code Section III guidelines. An evaluation was performed⁽¹⁵⁾ that considered both unirradiated beginning-of-life conditions with no wall thinning and with wall thinning and irradiation strengthening of the thimble tube material. The evaluation was performed for a limiting design and considered shipping/handling loads and Condition I – IV events. It was concluded that [] ^{a, b, c}. Since [] ^{a, c}.

Revised Westinghouse Design Criteria for Hydrogen

A review of material property data for Westinghouse Zircaloy-4 and ZIRLO™ structural material indicates that [] ^{a, b, c}. There is no decrease of yield or ultimate strength with the hydrogen content. Ductility is primarily affected by irradiation, and [] ^{a, c}. The impact of irradiation on thimble tube stresses has also been evaluated. It was

concluded that [

] ^{a, b, c}. Thus, the ductility of thimble tubes is not an issue with present designs. Crush tests on 5x5 grid sections showed that the seismic capability factor [

] ^{a, b, c}. Crush tests on full size production grids showed that there was [^{a, b, c}.

All of these results support the conclusion that the current Westinghouse imposed hydrogen criteria for structural components is inappropriate. The desirable characteristics of a design criterion are:

- Related to a physical criteria,
- There is a basis for quantifying the criteria, and
- The criterion can be readily verified by measurements.

The data and discussions provided previously show that the first two characteristics are not met by the current Westinghouse structural hydrogen content limit. Verification of the hydrogen content is difficult in that it requires sending a structural section to a hot cell for analysis, and there can be large uncertainties associated with the measurement methods. The difficulties in performing such measurements severely limit the amount of data available for verification. It is thus concluded that the current structural hydrogen criterion possesses none of the desired characteristics of a design criterion.

A more appropriate criterion that has all of the desired characteristics is a wall thinning criteria. It is proposed that Westinghouse eliminate the current hydrogen content criterion for structural components and replace it with the following criterion:

“The Zircaloy-4 and ZIRLO™ structural component stresses will be consistent with ASME Code Section III requirements after accounting for thinning due to corrosion.”

Conclusions

The current structural component criterion applied to Westinghouse fuel pre-dates NUREG-0800⁽¹⁾ and does not conform completely to NUREG-0800⁽¹⁾, to industry guidelines⁽⁷⁾, and to those criterion in use at other Westinghouse business units. The proposed updated structural component criterion conforms to both NUREG-0800⁽¹⁾ and to industry guidelines⁽⁷⁾. This updated criterion is sufficient to preclude fuel damage and will also promote convergence between Westinghouse business units. As noted in the Introduction, this change is only applicable to the fuel assembly structure. The criterion for fuel rod cladding remains unchanged as documented in References 2, 8, and 9.

References

1. U. S. NRC, "USNRC Standard Review Plan, Section 4.2, Fuel System Design," NUREG-0800, July 1981.
2. Davidson, S. L. (Ed.), et al., "VANTAGE + Fuel Assembly Reference Core Report," WCAP-12610-P-A, April 1995.
3. S. Wisner and R. B. Adamson, "G E Nuclear Energy," 1996 , Vol. 3, pg. 1.
4. W. Jahreib, R. Manzel and E. Ortlieb, "Annual Meeting on Nuclear Technology," Cologne, 1993 pg. 303.
5. A. Hermann, et. al., "Fuel Cladding Integrity at High Burnups (Part I)," NFIR-III/EPRI, DRAFT TR-108753-P1, July 1999, pg. 4-18.
6. R. C. Kuo, et al., "Fuel Cladding Integrity at High Burnups (Part II)," NFIR-III/EPRI, TR-108753 P2, August 1999, pg. 3-47.
7. EPRI, "Robust Fuel Program Technical Requirements for Nuclear Fuel Performance," TR-110689, November 1999.
8. Davidson, S. L., (Ed.), et al., "Extended Burnup Evaluation of Westinghouse Fuel," WCAP-10125-P-A, December 1985.
9. Davidson, S. L., (Ed.), et al., "Westinghouse Fuel Criteria Evaluation Process," WCAP-12488-A, October 1994.
10. S. J. King, "Irradiated V. C. Summer 17x17 PERFORMANCE + ZIRLO™ Mid Grid and IFM Grid Hydride Orientation and Morphology from ZIRLO™ Skeleton Assembly L50, Photomicrographs from the Hot Cell," MFRD-99-099, August 17, 1999. [Proprietary internal Westinghouse document - not for public distribution]

11. K. Yueh, "V. C. Summer Oxide, Hydrogen, and Hydride Report," MFRD-00-010, November 19, 1999. [Proprietary internal Westinghouse document - not for public distribution]
12. W. J. Leech, "Ductility and Strength of Westinghouse Zircaloy-4 and ZIRLO™ Material," MFRD-00-208, November 1, 2000. [Proprietary internal Westinghouse document - not for public distribution]
13. M. Winegardner, "Oxidized Zircaloy-4 Grid Crush Test Report," PD1-00-222, October 23, 2000. [Proprietary internal Westinghouse document - not for public distribution]
14. S. J. King, "Data from Grid Impact Testing of 5x5 Pre-Corroded Zr-4 and ZIRLO™ Grids," PD1-98-183, September 28, 1999. [Proprietary internal Westinghouse document - not for public distribution]
15. D. P. Seel, "17x17 Guide Thimble Stresses Consideration of the Effects of Irradiation and Corrosion," NGF-0-30, August 24, 2000. [Proprietary internal Westinghouse document - not for public distribution]

Figure 1. Ductility vs Hydrogen Content for Unirradiated ZIRLO™ Strip Material

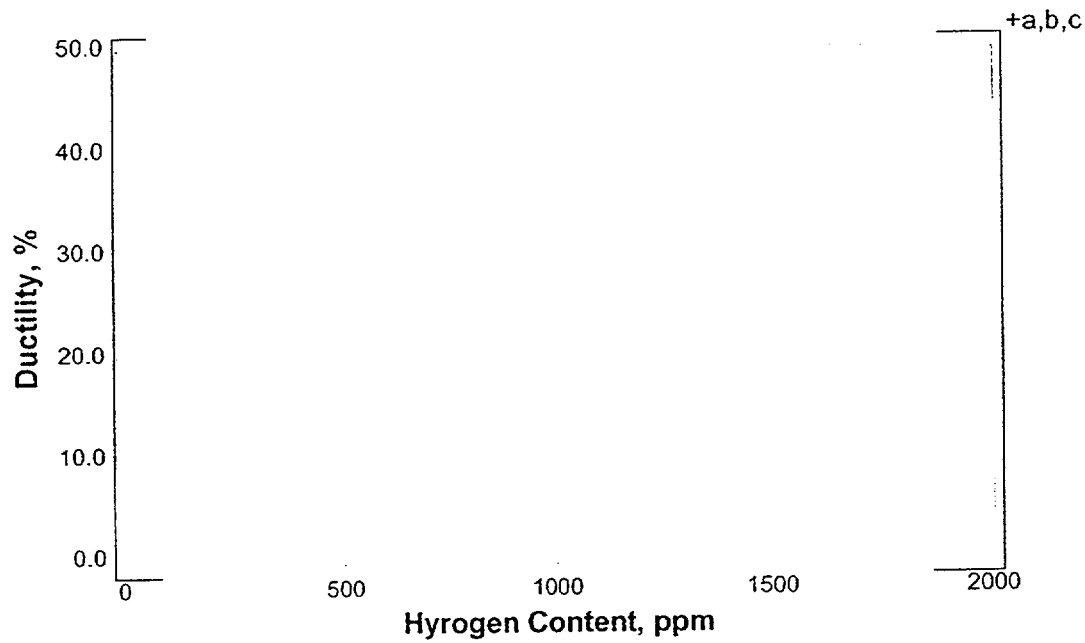


Figure 2. Yield Strength vs Hydrogen Content for Unirradiated ZIRLO™ Strip Material

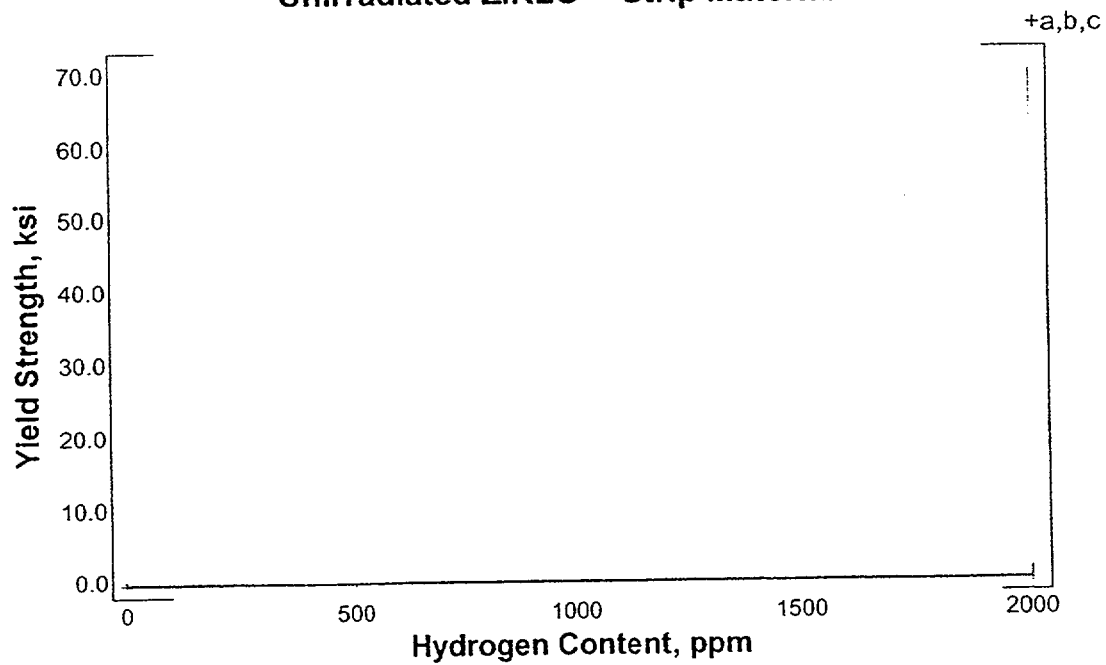


Figure 3. Ultimate Strength vs Hydrogen Content for Unirradiated ZIRLO™ Strip Material

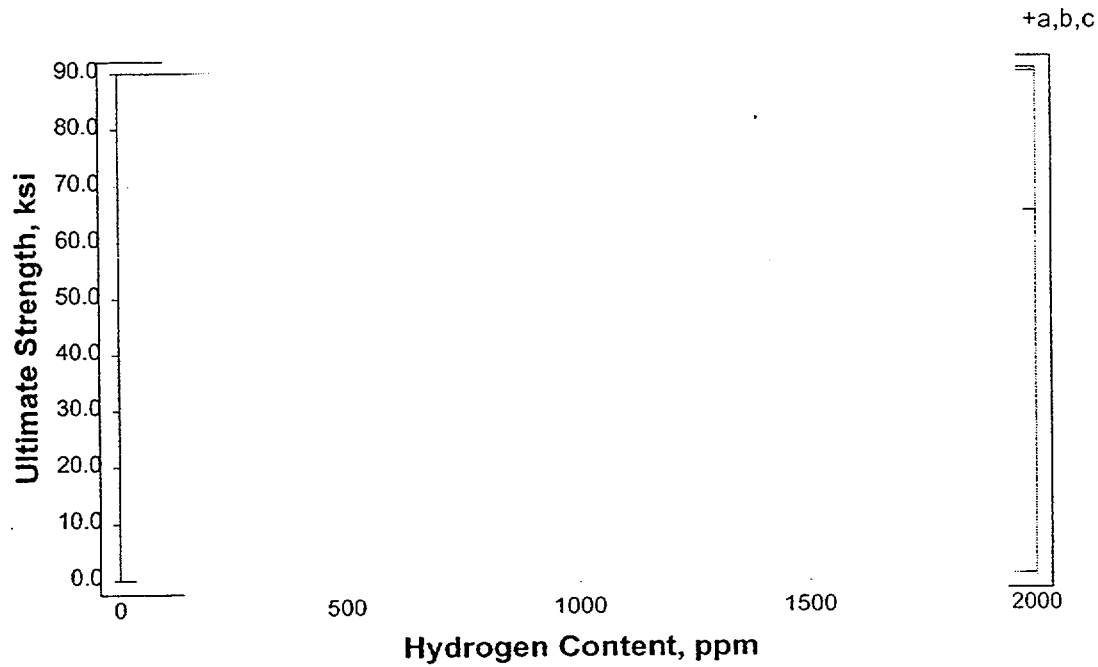


Figure 4. Room Temperature Ductility vs Hydrogen Content for Unirradiated ZIRLO™ Thimble Tubes

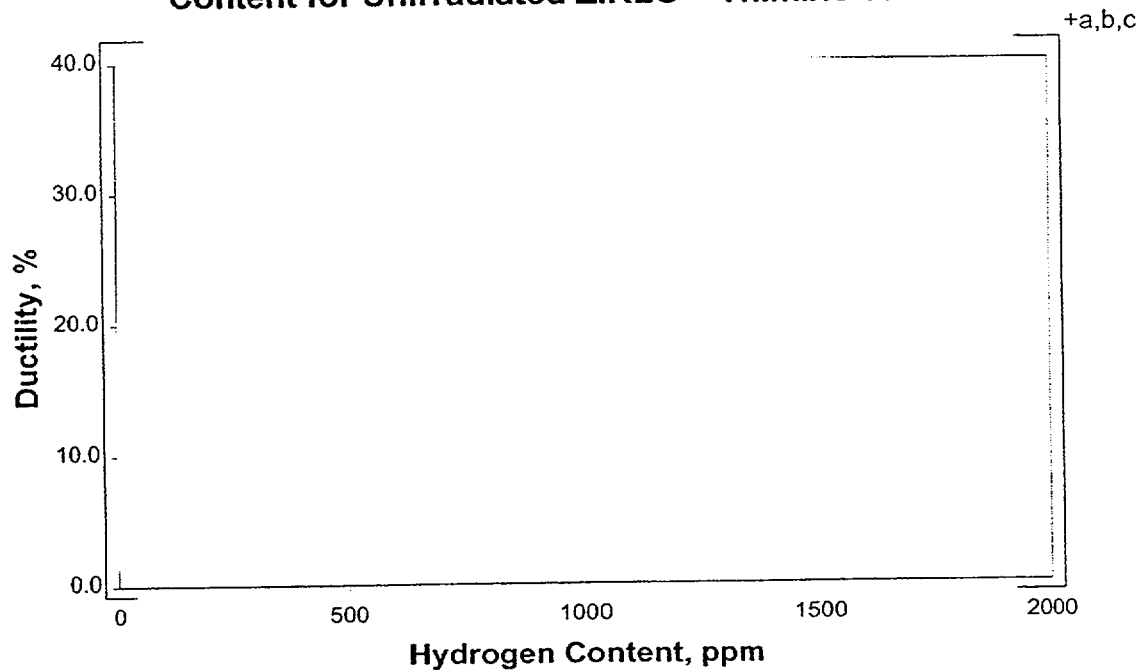


Figure 5. Elevated Temperature Ductility vs Hydrogen Content for Unirradiated ZIRLO™ Thimble Tubes

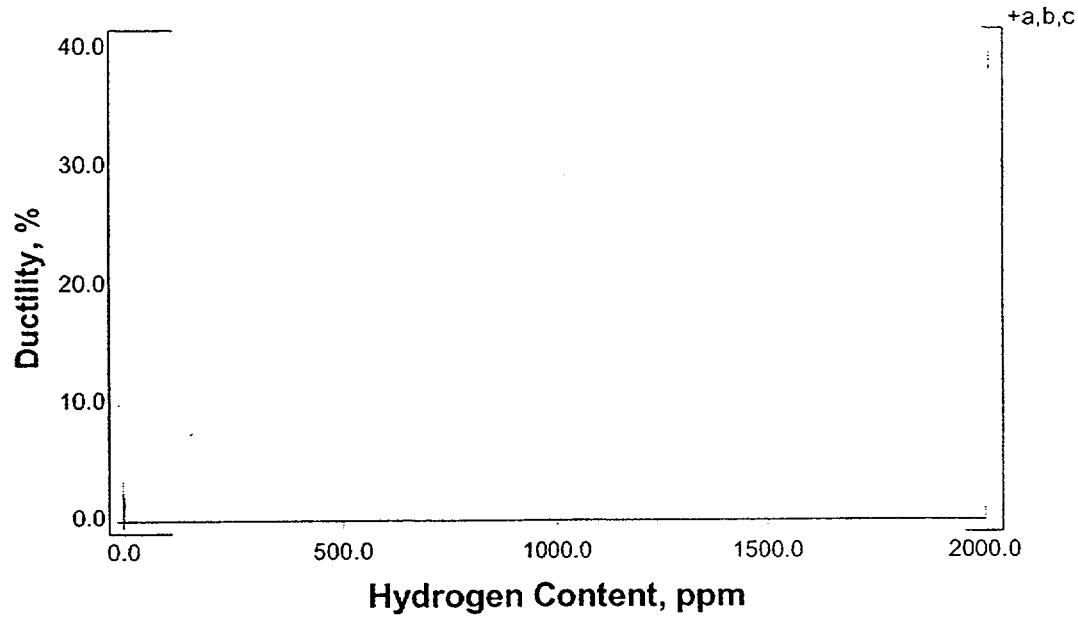


Figure 6. Room Temperature Strength vs. Hydrogen Content for ZIRLO™ Thimble Tubes

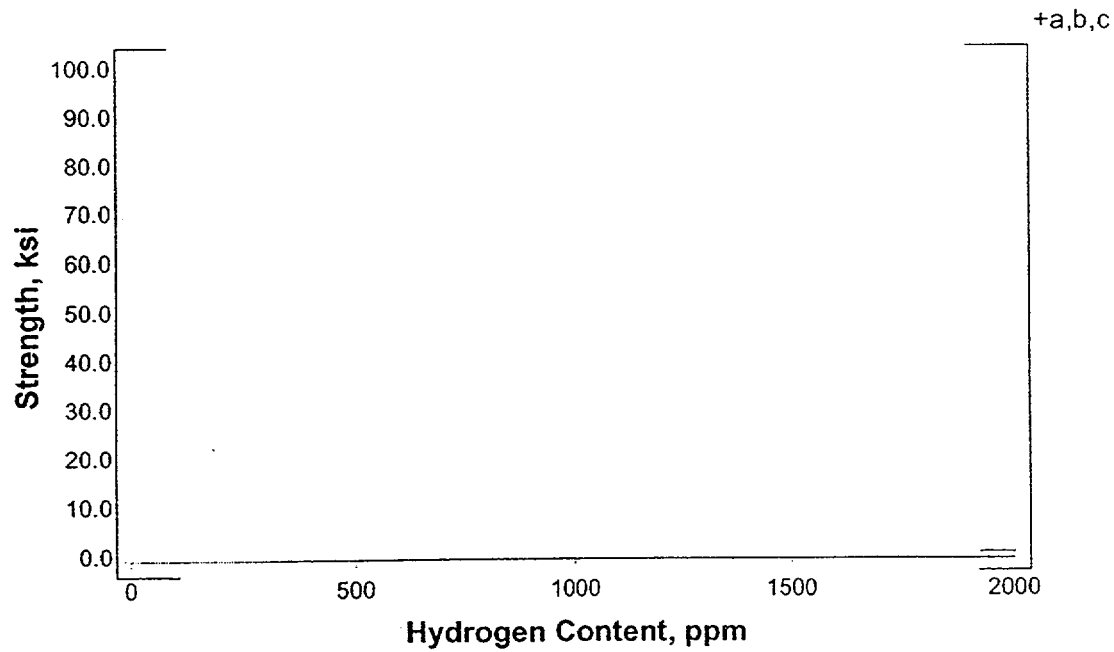


Figure 7. Elevated Temperature Strength vs Hydrogen Content for Unirradiated ZIRLO™ Thimble Tubes

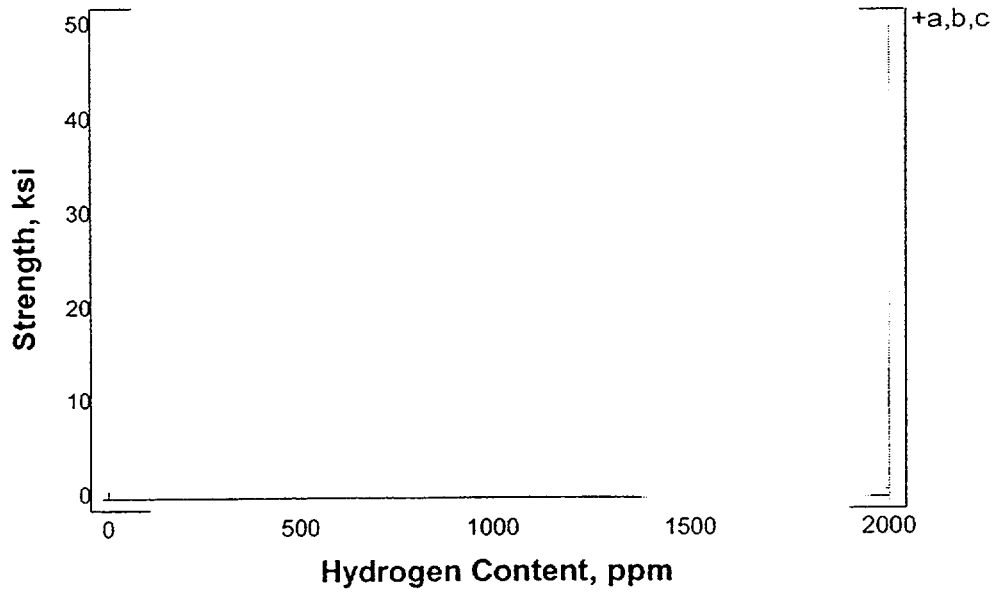


Figure 8. Room Temperature Ductility of Irradiated Thimble Tubes

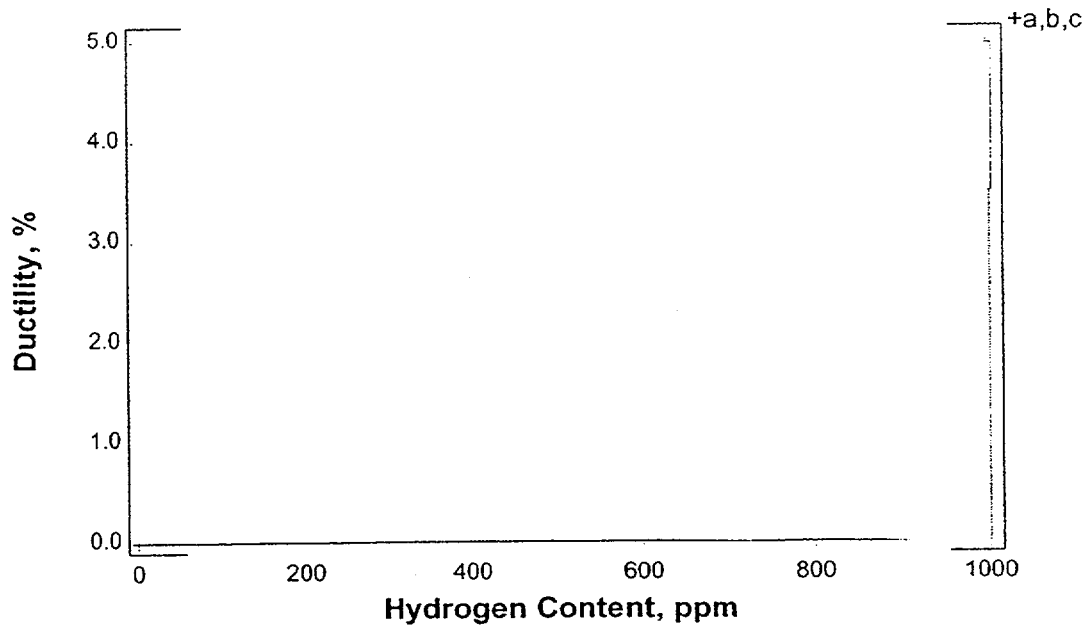


Figure 9. Elevated Temperature Ductility of Irradiated Thimble Tubes

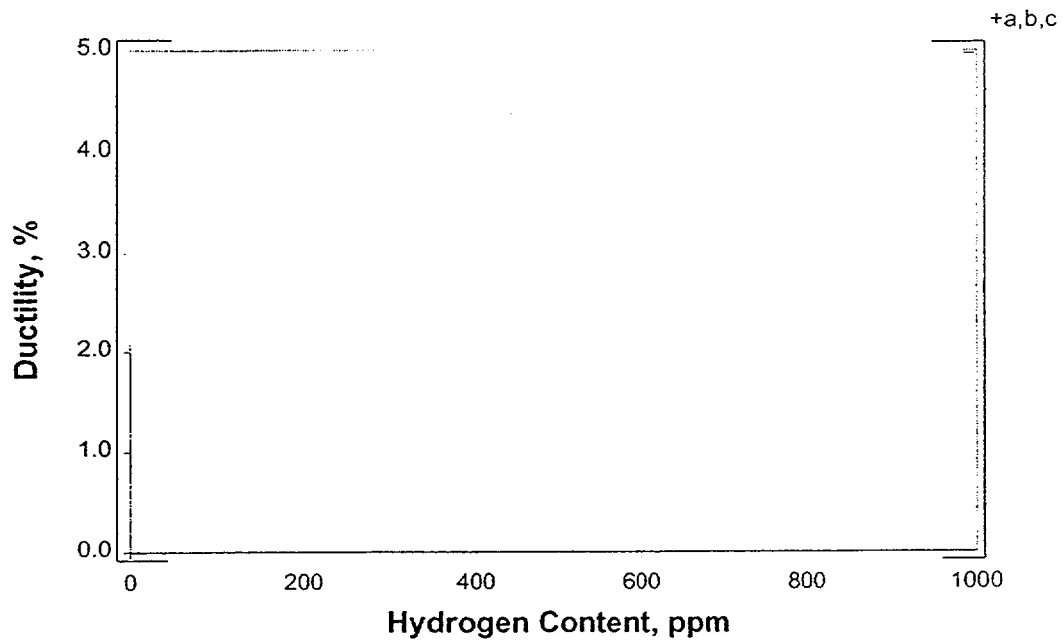


Figure 10. Room Temperature Strength of Irradiated Thimble Tubes

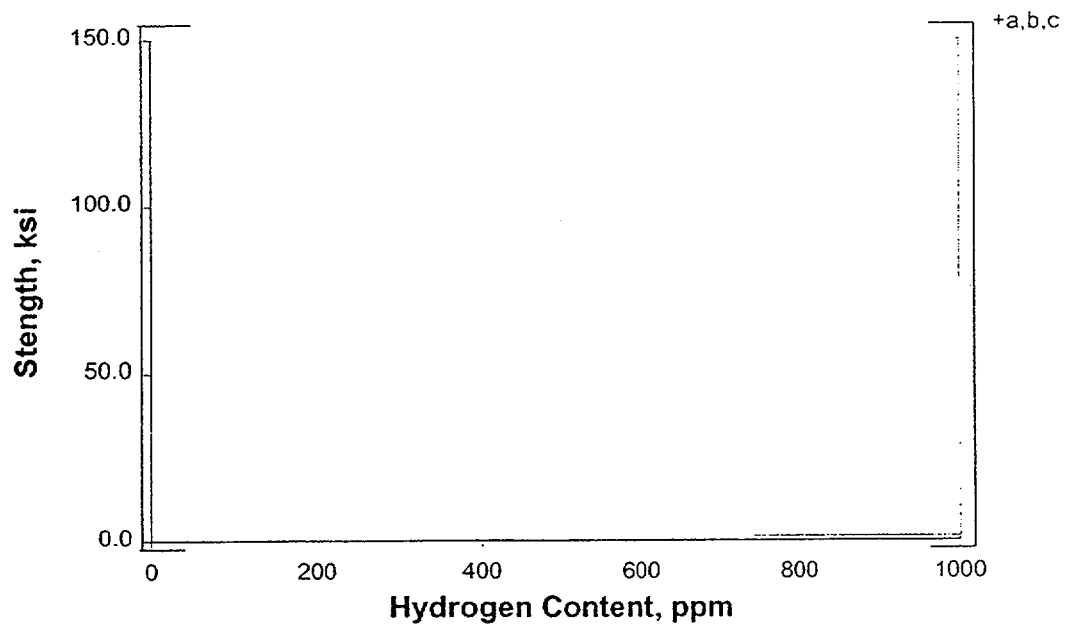


Figure 11. Elevated Temperature Strength of Irradiated Thimble Tubes

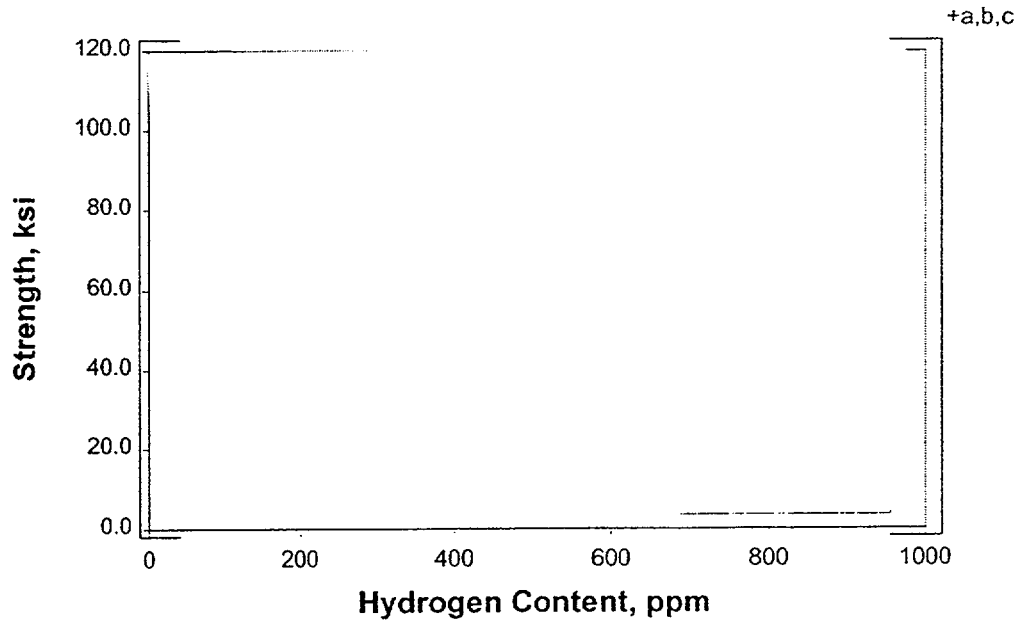


Figure 12. Elevated Temperature Ductility of Unirradiated and Irradiated Westinghouse Thimble Tubes

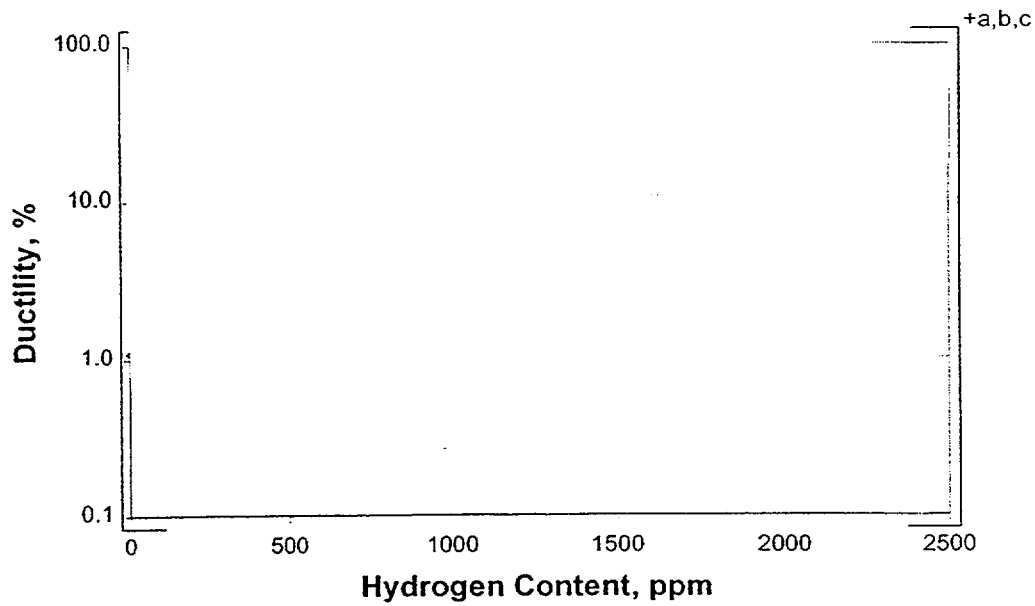


Figure 13. Crush Strength vs Hydrogen Content for Unirradiated 5X5 Grid Sections

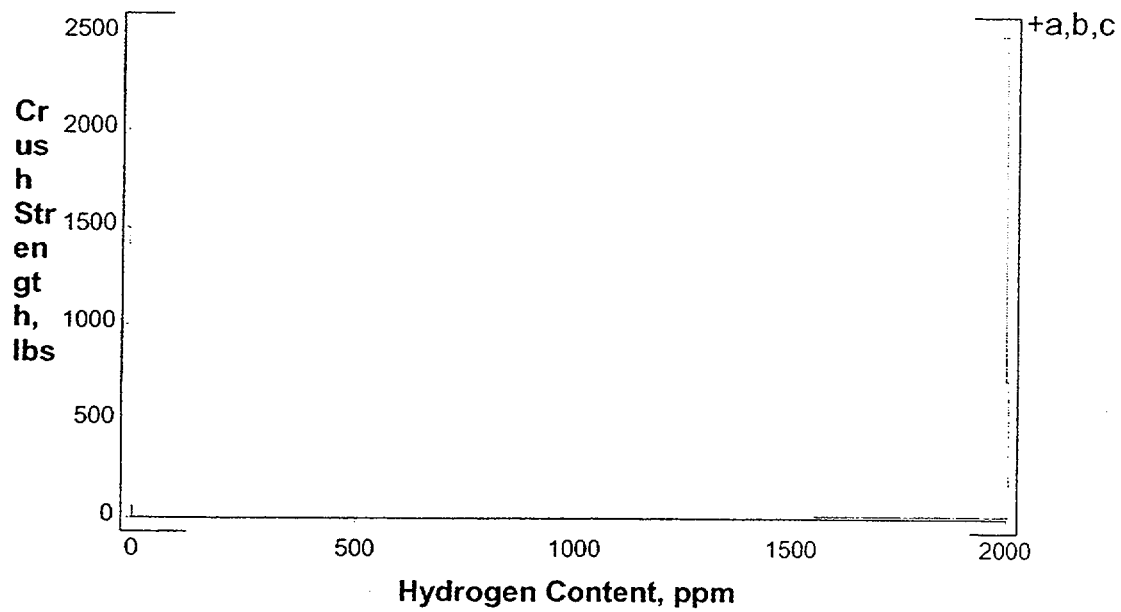
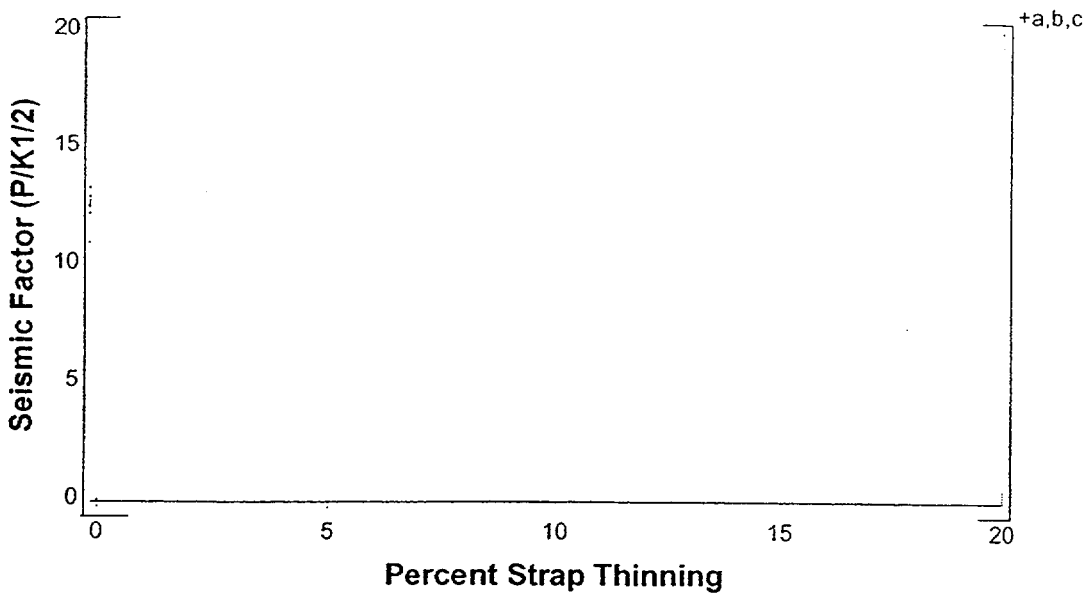


Figure 14. Seismic Capability Factor vs. Grid Strap Thinning for Production Grids



Section D



Westinghouse
Electric Company

Box 355
Pittsburgh Pennsylvania 15230-0355

October 29, 2001
LTR-NRC-01-37

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Attention: J. S. Wermiel, Chief
Reactor Systems Branch
Division of Systems Safety and Analysis

Subject: Response to Request for Additional Information regarding "Addendum 1 Revision 1 of
WCAP-12488-A / WCAP-14204-A, 'Westinghouse Fuel Criteria Evaluation Process,'" (Proprietary
/ Non-proprietary)

Reference: (1) Letter from H. A. Sepp (Westinghouse) to J. S. Wermiel (NRC), "Addendum 1 Revision 1 to
WCAP-12488-A / WCAP-14204-A, 'Westinghouse Fuel Criteria Evaluation Process,'" (Proprietary / Non-proprietary)," August 6, 2001

Dear Mr. Wermiel:

Enclosed are copies of the Response to Request for Additional Information regarding "Addendum 1 Revision 1 of
WCAP-12488-A / WCAP-14204-A, 'Westinghouse Fuel Criteria Evaluation Process,'" (Proprietary / Non-
proprietary).

Also enclosed are:

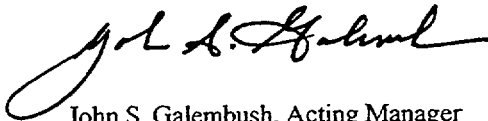
1. One (1) copy of the Application for Withholding, AW-01-1494 with Proprietary Information Notice and
Copyright Notice.
2. One (1) copy of Affidavit, AW-01-1494.

This submittal contains Westinghouse proprietary information of trade secrets, commercial or financial information
which we consider privileged or confidential pursuant to 10 CFR 9.17(a)(4). Therefore, it is requested that the
Westinghouse proprietary information attached hereto be handled on a confidential basis and be withheld from public
disclosure.

This material is for your internal use only and may be used solely for the purpose for which it is submitted. It should
not be otherwise used, disclosed, duplicated, or disseminated, in whole or in part, to any other person or organization
outside the Office of Nuclear Reactor Regulation without the expressed prior written approval of Westinghouse.

Correspondence with respect to any Application for Withholding should reference AW-01-1494 and should be addressed to H. A. Sepp, Manager of Regulatory and Licensing Engineering, Westinghouse Electric Company, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,

A handwritten signature in black ink, appearing to read "John S. Galembush". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John S. Galembush, Acting Manager
Regulatory and Licensing Engineering

Copy to:
S. L. Wu, NRR
R. Caruso, NRR
M. Scott, NRR



Westinghouse
Electric Company

Box 355
Pittsburgh Pennsylvania 15230-0355

October 29, 2001
AW-01-1494

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Attention: J. S. Wermiel, Chief,
Reactor Systems Branch
Division of Systems Safety and Analysis

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Response to Request for Additional Information regarding "Addendum 1 Revision 1 of
WCAP-12488-A / WCAP-14204-A, 'Westinghouse Fuel Criteria Evaluation Process'," (Proprietary
/ Non-proprietary)

Reference: Letter from John S. Galembush to J. S. Wermiel, LTR-NRC-01-37, dated October 29, 2001

Dear Mr. Wermiel:

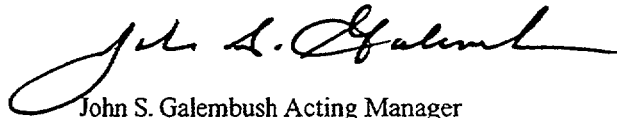
The application for withholding is submitted by Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse"), pursuant to the provisions of paragraph (b)(1) of Section 2.790 of the Commission's regulations. It contains commercial strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary material for which withholding is being requested is identified in the proprietary version of the subject report. In conformance with 10 CFR Section 2.790, Affidavit AW-01-1494 accompanies this application for withholding, setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

Correspondence with respect to this application for withholding or the accompanying affidavit should reference AW-01-1494 and should be addressed to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "John S. Galembush". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John S. Galembush Acting Manager
Regulatory and Licensing Engineering

Proprietary Information Notice

Transmitted herewith are proprietary and non-proprietary versions of documents furnished to the NRC. In order to conform to the requirements of 10 CFR 2.790 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.790(b)(1).

Copyright Notice

The documents transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies for the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.790 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond these necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

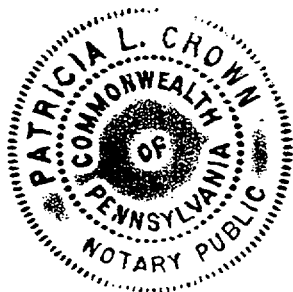
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared John S. Galembush, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse") and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



A handwritten signature of John S. Galembush in cursive script.

John S. Galembush, Acting Manager
Regulatory and Licensing Engineering

Sworn to and subscribed
before me this 29th day
of October, 2001.

Notarial Seal
Patricia L. Crown, Notary Public
Monroeville Boro, Allegheny County
My Commission Expires Feb. 7, 2005
Member, Pennsylvania Association of Notaries

A handwritten signature of Patricia L. Crown in cursive script.

Notary Public

- (1) I am Acting Manager, Regulatory and Licensing Engineering, in Nuclear Services, of the Westinghouse Electric Company LLC, a Delaware limited liability company ("Westinghouse") and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Electric Company.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.790 of the Commission's regulations and in conjunction with the Westinghouse application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by the Westinghouse Electric Company in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.
- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
 - b) It is information which is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
 - c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.
 - (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.790, it is to be received in confidence by the Commission.
 - (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.

- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked "Response to Request for Additional Information regarding 'Addendum 1 Revision 1 of WCAP-12488-A / WCAP-14204-A, 'Westinghouse Fuel Criteria Evaluation Process',' (Proprietary / Non-proprietary)" October 29, 2001, for submittal to the Commission, being transmitted by Westinghouse Electric Company (W) letter (LTR-NRC-01-37) and Application for Withholding Proprietary Information from Public Disclosure, John S. Galembush, Westinghouse, Acting Manager Regulatory and Licensing Engineering to the attention of J. S. Wermiel, Chief, Reactor Systems Branch, Division of Systems Safety and Analysis. The proprietary information as submitted by Westinghouse Electric Company is to provide the response to a Request for Additional Information with respect to Addendum 1 Revision 1 of WCAP-12488-A / WCAP-14204-A.

This information is part of that which will enable Westinghouse to:

- (a) The proposed criteria replace indirect performance correlations with direct performance correlations that are more readily measured and provide direct feedback to design.
- (b) The revised criteria conform to both NUREG-0800 and to current industry guidelines.
- (c) These updated criteria will promote convergence between Westinghouse business units.

Further this information has substantial commercial value as follows:

- (a) Westinghouse can continue to ensure the highest quality of fuel since the proposed criteria is more readily measurable and thus provides direct feedback to fuel designs.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended for developing the enclosed improved core thermal performance methodology.

Further the deponent sayeth not.

WESTINGHOUSE NON-PROPRIETARY CLASS 3

**Response to Request for Additional Information regarding
“Addendum 1 Revision 1 of WCAP-12488-A / WCAP-14204-A,
‘Westinghouse Fuel Criteria Evaluation Process’,” (Proprietary / Non-proprietary)**

October 2001

**REQUEST FOR ADDITIONAL INFORMATION WCAP-12488-A [WCAP-14204-A],
"WESTINGHOUSE FUEL CRITERIA EVALUATION PROCESS"
SUPPLEMENT 1
PROJECT NO. 694**

Question 1: The Addendum states that the existing hydrogen content criterion will be eliminated and replaced with a criterion that applies only to structural components. This appears to leave no criterion for the cladding. The Addendum needs to be revised to clarify that the hydrogen criterion for cladding remains.

Response 1: The fuel rod cladding criterion remains unchanged. Clarifications to the addendum have been made. Refer to the updated Addendum 1 Revision 1 with revision bars noting the changes (copy attached).

Question 2: Please provide reference cites in support of discussions in the Addendum introduced by the following statements:

- a. Bottom of page 1: "Unheated structural components are not susceptible to hydrogen redistribution due to temperature gradients within the components. Thus, high local hydrogen concentrations do not exist." The first statement is obvious; it is unclear that the second follows inevitably from the first, since the components are heated in service. Reference cite and/or clarification is needed.

Response 2a: A clarification has been made and References 10 and 11 have been added. Refer to the updated Addendum 1 Revision 1 with revision bars noting the changes (copy attached).

- b. 1st paragraph under "Effects of Hydrogen Content" subheading on page 2. "Westinghouse has conducted programs..." Reference cites are needed for the discussion under this heading and the figures that are provided.

Response 2b: Reference 12 has been added. Refer to the updated Addendum 1 Revision 1 with revision bars noting the changes (copy attached).

- c. 1st paragraph under "Impacts of Hydrogen Content on Grids" subheading on page 5. "Westinghouse has conducted tests..." Reference cites are needed for this discussion.

Response 2c: References 13 and 14 have been added. Refer to the updated Addendum 1 Revision 1 with revision bars noting the changes (copy attached).

- d. 1st paragraph under "Evaluation of Thimble Tube Stresses" subheading on page 6. "Thimble tube stresses are evaluated..." Reference cites are needed for this discussion.

Response 2d: Reference 15 has been added. Refer to the updated Addendum 1 Revision 1 with revision bars noting the changes (copy attached).

Question 3: The last sentence in the first paragraph of the Introduction states that the term zircaloy is used in a generic sense to refer to Zircaloy-4 and ZIRLO. The staff believes this practice is potentially confusing to readers, and the staff has recognized and approved documents stating ZIRLO is a material with separate composition and properties from those of Zircaloy 4. The Addendum needs to be revised to eliminate generic use of "zircaloy" in referring to Zircaloy-4 and ZIRLO. (Future documents should also not use the generic term.).

Response 3: Clarifications to the addendum have been made. Refer to the updated Addendum 1 Revision 1 with revision bars noting the changes (copy attached).