



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

May 13, 2003
NOC-AE-03001450
10CFR50.90

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket No. STN 50-498 and STN 50-499
License Amendment Request for Approval of a Change in Analytical Methodology

Pursuant to 10CFR50.90, STP Nuclear Operating Company (STPNOC) proposes to amend Operating Licenses NPF-76 and NPF-80 for the South Texas Project to allow the use of a revised methodology described in WCAP-14882-S1-P (attached) for the loss of normal feedwater/loss of offsite power transient analysis. Credit will be taken for the heat transfer characteristics of the thick metal masses in the reactor coolant system and excessive conservatism in the steam generator water mass will be removed. STPNOC has determined that the proposed change requires prior NRC approval as a departure from a methodology as described in 10CFR50.59(c)(2)(viii).

Attachment 1 demonstrates that the amendment involves no significant hazards consideration and Attachment 2 provides the proposed revised UFSAR pages (for information only). The Plant Operations Review Committee has reviewed the proposed change and has recommended its approval. The Nuclear Safety Review Board has approved the change. STPNOC has notified the State of Texas in accordance with 10CFR50.91(b).

Also attached with this letter are WCAP-14882-S1-P and WCAP-15234-S1, which provide the technical justification for the proposed computer model changes. Because WCAP-14882-S1-P contains information proprietary to Westinghouse Electric Company, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the NRC and addresses with specificity the considerations listed in Section 10CFR 2.790(b)(4). Accordingly, it is respectfully requested that the information that is proprietary to Westinghouse be withheld from public disclosure in accordance with 10CFR2.790.

Correspondence with respect to the copyright or proprietary aspects of WCAP-14882-S1-P or the supporting Westinghouse affidavit should reference the Westinghouse authorization letter (CAW-02-1574) 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.

STI: 3154134

APD01

STPNOC requests approval of this proposed amendment by January 30, 2004 and requests 30 days for implementation of the change after approval. If there are any questions regarding this proposed amendment, please contact Mr. Mark Kanavos at (361) 972-7181 or me at (361) 972-7902.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 13, 2003



T.J. Jordan
Vice President,
Engineering & Technical Services

jtc

- Attachments:
1. Licensee's Evaluation
 2. Proposed UFSAR Changes (Mark-up) For Information Only
 3. Proprietary Information Notice
 4. Copyright Notice
 5. Application for Withholding Proprietary Information from Public Disclosure
 6. WCAP-15234-S1, "RETRAN-02 Modeling and Qualification For Westinghouse Pressurized Water Reactors Non-LOCA Safety Analyses Supplement 1 - Thick Metal Mass Heat Transfer Model and NOTRUMP-Based Steam Generator Mass Calculation Method," (Nonproprietary) Rev. 0, December 2002
 7. WCAP-14882-S1-P, "RETRAN-02 Modeling and Qualification For Westinghouse Pressurized Water Reactors Non-LOCA Safety Analyses Supplement 1 - Thick Metal Mass Heat Transfer Model and NOTRUMP-Based Steam Generator Mass Calculation Method," (Proprietary) Rev. 0, December 2002

cc: w/o Attachment 7
(paper copy)

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Attachment 1

Licensee's Evaluation

LICENSEE'S EVALUATION

1.0 DESCRIPTION

This letter is a request to amend Operating Licenses NPF-76 and NPF-80 for the South Texas Project to allow the use of a revised methodology described in WCAP-14882-S1-P for the loss of normal feedwater/loss of offsite power transient analysis. Credit will be taken for the heat transfer characteristics of the thick metal masses in the reactor coolant system and excessive conservatism in the steam generator water mass will be removed. STPNOC has determined that the proposed change requires prior NRC approval as a departure from a methodology as described in 10CFR50.59(c)(2)(viii).

STPNOC requests approval of this proposed amendment by January 30, 2004 and requests 30 days for implementation of the change after approval.

2.0 PROPOSED CHANGE

As documented and justified in WCAP-14882-S1-P (attached), the proposed changes to the current RETRAN methodology include:

- Using a more detailed thick metal mass heat transfer model that is consistent with the enhanced LOFTRAN thick metal mass heat transfer model approved for use at Byron-Braidwood
- Using the NOTRUMP code to generate less conservative, more realistic SG water masses as input to the RETRAN analyses for loss of normal feedwater and for feedwater line break

There are no changes required for the Technical Specifications.

3.0 BACKGROUND

According to Section 15.2.7 of the Updated Final Safety Report (UFSAR), a loss of normal feedwater (from pump failures, valve malfunctions, or loss of offsite power) results in a reduction in capability of the secondary system to remove the heat generated in the reactor core. If an alternative supply of feedwater were not supplied to the plant, core residual heat following reactor trip would heat the primary system water to the point where water relief from the pressurizer would occur, resulting in a substantial loss of water from the reactor coolant system

(RCS). Since the plant is tripped well before the steam generator heat transfer capability is reduced, the primary system variables never approach a DNB condition.

The worst postulated loss of normal feedwater event is one in which a loss of offsite power occurs coincident with reactor trip, due to the decreased capability of the reactor coolant to remove residual core heat as a result of the reactor coolant pump coastdown.

The current RETRAN methodology (Ref. 1) includes several assumptions that are unnecessarily conservative for the analyses of long-term heatup events such as loss of normal feedwater, loss of offsite power, and feedwater line break events. One such assumption is to neglect the heat transfer between the reactor coolant and the RCS piping. This assumption is conservative in that it maximizes primary-side coolant temperature changes. However, this level of conservatism is considered unnecessary, so Westinghouse has developed an enhanced thick metal model to be used in the RETRAN analysis of long-term heatup events.

Conditions in the current RETRAN steam generator model are also unnecessarily conservative because the model under-predicts the steam generator water mass. Therefore, an existing method in which more realistic but still conservative steam generator water masses are calculated is employed.

4.0 TECHNICAL ANALYSIS

A detailed description of the analytical methods, data, and results is provided in WCAP-14882-S1-P (attached).

Thick Metal Mass

Heat transfer to and from metal in the RCS is ignored in most non-LOCA analyses performed by Westinghouse with RETRAN (Ref. 1). This is conservative because it minimizes the primary system heat capacity and thus accentuates RCS temperature changes. One situation where neglecting heat transfer between the RCS metal and reactor coolant would not be conservative is in the computation of mass and energy release following a steam line break. For steam line break mass and energy release calculations performed with RETRAN, Westinghouse applies a simplified thick metal mass heat transfer model that conservatively over-predicts the heat transfer from the thick metal to the reactor coolant.

In transients with a large and relatively slow increase in RCS temperature, such as a loss of normal feedwater with minimum auxiliary feedwater (AFW) flow, there would be a substantial amount of heat absorbed in the RCS thick metal mass. While it is conservative to ignore this effect in this type of transients, this conservatism is considered unnecessary. To credit the heat absorption characteristics of RCS thick metal masses, the simplified thick metal mass heat transfer model used in the steamline break mass and energy release calculations is inappropriate because it would overestimate the heat transfer to the thick metal.

Therefore, an enhanced RETRAN thick metal mass heat transfer model described in WCAP-14882-S1-P has been developed for use in the long-term heatup events. The model is based on the enhanced LOFTRAN thick metal mass heat transfer model described in WCAP-7907-S1-P, Rev. 1 (Ref. 2), which was approved by the NRC for use in the analysis of a feedwater line break in a Safety Evaluation Report for Byron-Braidwood (Ref. 3).

The enhanced RETRAN thick metal mass model and the current RETRAN model were both used to analyze a loss of normal feedwater/loss of offsite power event. As in the enhanced LOFTRAN thick metal model, the parameters in the enhanced RETRAN model follow the same trend, just slightly less conservative than the current RETRAN model. The enhanced RETRAN thick metal model remains conservative with respect to actual plant conditions in that not all of the coolant-to-metal heat transfer regions are modeled. Refer to WCAP-14882-S1-P for further details.

Steam Generator Water Mass Calculation Method

The NRC Safety Evaluation Report for the current RETRAN model noted that the Westinghouse-developed RETRAN steam generator models under-predict secondary-side steam generator water masses. Although this is conservative for the analyses of many transients, the steam generator masses associated with the Westinghouse-developed RETRAN steam generator models are considered overly conservative. Therefore, Westinghouse has utilized the NOTRUMP steam generator thermal-hydraulic computer code to calculate less conservative, more realistic secondary-side steam generator water masses. These masses will be applied in RETRAN analyses of loss of normal feedwater and feedwater line break events to define the amount of water mass in the steam generators at the time a low-steam generator water level reactor trip is reached. Application of these steam generator masses in the RETRAN analysis is similar to the method currently employed in the analysis of secondary-side transients using the approved LOFTRAN computer code.

The NOTRUMP computer code is a one-dimensional nodal network code used for the analysis of thermal-hydraulic transients. Although primarily used for small break LOCA analyses, the NOTRUMP computer code has also been used for steam generator simulations, as presented in WCAP-9230 (Ref. 4), which was submitted to the NRC as the licensing basis for the Westinghouse methodology for analyzing feedwater line break accidents. WCAP-9230 was submitted to the NRC along with, and makes reference to, WCAP-9236 (Ref. 5), and has since been accepted by the NRC as an approved methodology for analyzing feedwater line break transients on many plant-specific licensing applications.

When the NOTRUMP code and the RETRAN code (with the revised steam generator water mass calculational method) were used to analyze a loss of normal feedwater, the NOTRUMP and RETRAN steam generator transient responses of key steam generator parameters on both the primary-side and the secondary-side (including secondary-side mass) matched very closely, as shown in WCAP-14882-S1-P. The close agreement demonstrates that the RETRAN code with the revised steam generator water mass calculational method is equivalent to the approved NOTRUMP analysis.

Analysis Results

The loss of normal feedwater analysis is performed to demonstrate the adequacy of the RCS and the AFW in removing long-term decay heat and preventing excessive heatup of the RCS with possible resultant RCS overpressurization or loss of reactor coolant. The analyses using both the current and the proposed RETRAN methodology show that the AFW system provides a sufficient supply of feedwater such that the capability of the steam generators to dissipate core residual heat without water relief from the RCS relief or safety valves is maintained. The analysis also indicates that at no time is there water relief from the pressurizer; Figure 15.2-9Da (in Attachment 2) shows that the peak water volume in the pressurizer is less than 2100 ft³, which is the filled pressurizer volume.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

STPNOC has evaluated whether a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No. The proposed methodology uses more realistic computer models with unnecessary conservatism removed. The methodology used to analyze the consequences of a postulated accident is not an initiator that can affect the probability or consequences of that accident. The change does not alter assumptions previously made in the radiological consequences of the accident. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No. The proposed methodology uses more realistic computer models with unnecessary conservatism removed. The methodology used to analyze the consequences of a postulated accident is not an initiator that can cause an accident to occur. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No. The proposed methodology uses more realistic computer models with unnecessary conservatism removed. Using the methodology of WCAP-14882-S1-P results in additional margin to pressurizer overfill for a postulated loss of normal feedwater/ loss of offsite power at STP. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10CFR20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(9). Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 REFERENCES

1. WCAP-14882-P-A (Proprietary) and WCAP-15234-A (Non-Proprietary), "RETRAN-02 Modeling and Qualification for Westinghouse Pressurized Water Reactor Non-LOCA Safety Analyses," April 1999
2. WCAP-7907-S1-P, Revision 1 (Proprietary) and WCAP-7907-S1-P, Revision 1 (Non-Proprietary), "LOFTRAN Code Description Supplement 1 - LOFTRAN Thick Metal Mass Heat Transfer Models," January 2001

3. Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 119 to Facility Operating License No. NPF-37, Amendment No. 119 to Facility Operating License No. NPF-66, Amendment No. 113 to Facility Operating License No. NPF-72, and Amendment No. 113 to Facility Operating License No. NPF-77 - EXELON Generation Company, LLC - Byron Station Unit Nos. 1 and 2, Braidwood Station Unit Nos. 1 and 2, Docket Nos. STN 50-454, STN 50-455, STN 50-456 and STN 50-457, May 2001
4. WCAP-9230, "Report on the Consequences of a Postulated Main Feedline Rupture," G. E. Lang and J. P. Cunningham, January 1978
5. WCAP-9236, "NOTRUMP - A Nodal Transient Steam Generator and General Network Code," P. E. Meyer and G. K. Frick, February 1978

Attachment 3

Proprietary Information Notice

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

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).

Attachment 4

Copyright Notice

COPYRIGHT NOTICE

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of 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 those 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.

Attachment 5

Application for Withholding Proprietary Information from Public Disclosure



Westinghouse Electric Company
Nuclear Services
P.O. Box 355
Pittsburgh, Pennsylvania 15230-0355
USA

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

Direct tel: (412) 374-5282
Direct fax: (412) 374-4011
e-mail: galembjs@notes.westinghouse.com

Attention: Mr. Samuel J. Collins

Our ref: CAW-02-1574

December 6, 2002

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WCAP-14882-S1-P, "RETRAN-02 Modeling and Qualification For Westinghouse Pressurized Water Reactors Non-LOCA Safety Analyses Supplement 1-Thick Metal Mass Heat Transfer Model and NOTRUMP-Based Steam Generator Mass Calculation Method (Proprietary)"

Dear Mr. Collins:

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-02-1574 signed by the owner of the proprietary information, Westinghouse Electric Company LLC. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.790 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by South Texas Project Nuclear Operating Company.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-02-1574 and should be addressed to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. S. Galembush'.

J. S. Galembush
Regulatory and Licensing Engineering

Enclosures

cc: G. Shukla/NRR

bcc: H. A. Sepp (ECE 4-7A) 1L, 1A
R. Bastien, (Brussels, Belgium) 1L, 1A
L. Ulloa (Madrid, Spain) 1L, 1A
C. Brinkman, 1L, 1A (Westinghouse Electric Co., 12300 Twinbrook Parkway, Suite 330, Rockville, MD 20852)
RLE Administrative Aide (ECE 4-7A) 1L, 1A (letters w/affidavits only)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

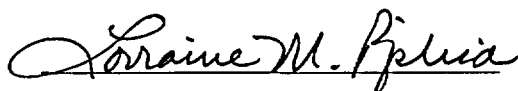
Before me, the undersigned authority, personally appeared J. S. Galembush, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC ("Westinghouse"), and that the averments of fact set forth in this Affidavit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



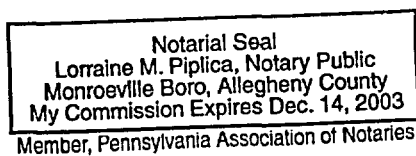
J. S. Galembush

Regulatory and Licensing Engineering

Sworn to and subscribed
before me this 6th day
of December, 2002



Notary Public



- (1) I am Manager, Regulatory and Licensing Engineering, in Nuclear Services, Westinghouse Electric Company LLC ("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 rule making proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Electric Company LLC.
- (2) I am making this Affidavit in conformance with the provisions of 10CFR 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 LLC 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 that 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 10CFR 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 in brackets, in WCAP-14882-S1-P, "RETRAN-02 Modeling and Qualification For Westinghouse Pressurized Water Reactors Non-LOCA Safety Analyses Supplement 1-Thick Metal Mass Heat Transfer Model and NOTRUMP-Based Steam Generator Mass Calculation Method (Proprietary)", dated December 2002 for submittal to the Commission, being transmitted by the South Texas Project Nuclear Operating Company letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk, Attention Mr. Samuel J. Collins. The proprietary information as submitted for use by Westinghouse Electric Company LLC for South Texas Project Unit 1 and Unit 2 is expected to be applicable for other licensee submittals in response to certain NRC requirements for justification of non- LOCA accident analysis results.

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

- (a) Perform non-LOCA licensing basis safety analysis calculations
- (b) Assist customers in obtaining NRC approval, when submitting similar analyses.
- (c) Increase margins in non-LOCA safety analysis calculations.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purposes of performing non-LOCA safety analysis.
- (b) Westinghouse can sell support and defense of this information to enhance their licensing position with their competitors.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

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 analyses 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.

Further the deponent sayeth not.

Attachment 6

WCAP-15234-S1