



Rolls-Royce

Rolls-Royce

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May 31, 2012

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

ATTENTION: To whom it may concern

SUBJECT: Rolls-Royce submittal of new **SPINLINE 3** licensing documents

REFERENCES: (1) Project Number 0773: **SPINLINE 3** Digital Safety Instrumentation and Control Platform (TAC No. ME3600)
(2) Rolls-Royce Letter to NRC, "Rolls-Royce submittal of new **SPINLINE 3** licensing documents", dated September 15, 2011
(3) Rolls-Royce Letter to NRC, "Rolls-Royce submittal of new **SPINLINE 3** licensing documents", dated November 18, 2011

In Reference 2, Rolls-Royce provided a schedule for the supplemental qualification testing program. Rolls-Royce committed to send the Supplemental Test Plan and Procedures along with a summary of the resolution of test deficiencies. In the March 8, 2012 meeting, Rolls-Royce also committed to provide an update to the Summary Equipment Qualification Test Report submitted by Reference 3.

Rolls-Royce hereby submits the following documents in connection with the referenced NRC project.

Document Title	Rolls-Royce Document Number	Versions: Proprietary (P), Non-proprietary (NP)	Notes
Equipment Qualification Plan	3 006 501 E	P	Replaces 3 006 501 D submitted June 15, 2010
Equipment Qualification Plan	3 006 501E-NP	NP	Replaces 3 006 501D-NP submitted June 15, 2010
Factory Acceptance Test Procedure	3 019 950 A	P	New Document (Replaces 3 010 783 A submitted June 15, 2010)

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Document Title	Rolls-Royce Document Number	Versions: Proprietary (P), Non-proprietary (NP)	Notes
System Setup and Checkout Test Procedure	3 010 294 D	P	Replaces 3 010 294 C submitted June 15, 2010
Seismic Test Procedure	3 010 288 D	P	Replaces 3 010 288 C submitted June 15, 2010
EMI/RFI Test Procedure	3 010 289 B	P	Replaces 3 010 289 A submitted March 31, 2011
Operability Test Procedure	3 010 295 D	P	Replaces 3 010 295 C submitted June 15, 2010
Prudency Test Procedure	3 010 296 C	P	Replaces 3 010 296 B submitted June 15, 2010
Investigations Results of 2011 NRC Qualification Tests	3 018 630 A	P	New document
Summary Equipment Qualification Test Report	3 014 545 B	P	Replaces 3 014 545 A submitted November 18, 2011
Summary Equipment Qualification Test Report	3 014 545B-NP	NP	Replaces 3 014 545A-NP submitted November 18, 2011

Rolls-Royce requests that the proprietary document be withheld from public disclosure. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding", an affidavit is enclosed identifying the specific portions of the above documents that are proprietary and the basis for making that determination. Non-proprietary version of Rolls-Royce documents 3 006 501E-NP and 3014545B – NP are also provided with the proprietary information redacted.

Nonproprietary versions of the other Rolls-Royce documents (test procedures and investigation results) are not provided based on the guidance in NRC Information Notice (IN) 2009-07. As noted in IN 2009-07, in instances in which a nonproprietary version


would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted.

All documents are submitted electronically and by hard copy mail.

Rolls-Royce will also provide an updated copy of the Master Configuration List (3 010 612) after completion of the factory acceptance test for the 2012 test specimen. The target date for submittal for this document is July 15, 2012.

If you have any questions related to this submittal, please contact me at 423-756-9730 extension 12 or by e-mail at mark.j.burzynski@ds-s.com.

Sincerely,


Mark J. Burzynski
US I&C Licensing Manager
Rolls-Royce



Rolls-Royce

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Affidavit

STATE OF TENNESSEE)

)

COUNTY OF HAMILTON)

1. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding", Rolls-Royce requests withholding from public disclosure of the documents listed in Table 1, which is attached to this affidavit.
2. I am familiar with the criteria applied by Rolls-Royce to determine whether certain Rolls-Royce information is proprietary. I am familiar with the policies established by Rolls-Royce to ensure the proper application of these criteria.
3. As required by 10 CFR 2.390, Rolls-Royce has included in Table 1 the following information:
 - Identity of the document or part sought to be withheld;
 - Declaration of the basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a);
 - Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public; and
 - Locations in the documents of all information sought to be withheld.
4. As required in § 2.390(b)(4); Rolls-Royce wishes to note that the request for withholding from public disclosure applies to pages that contain commercially sensitive information that Rolls-Royce normally discloses only under a Non-Disclosure Agreement (NDA). This commercially sensitive information is not available in public sources and is the type of information customarily held in confidence by Rolls-Royce and our competitors.

5. Rolls-Royce is transmitting this information to NRC in confidence.
6. As noted in Table 1, release of this information in a public forum could cause harm to Rolls-Royce by revealing trade secrets and/or commercially sensitive design and operational details and technical processes related to designing, building, and/or operating a *SPINLINE 3* digital safety instrumentation and control system.
7. As Rolls-Royce US I&C Licensing Manager, I have been specifically delegated responsibility for reviewing the information sought to be withheld, and I am authorized to apply for its withholding on behalf of Rolls-Royce.
8. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Mark J. Burzynski

Mark J. Burzynski

US I&C Licensing Manager

Rolls-Royce

Sworn to and subscribed before me

this 29th day of May, 2012

Heather A. Perry

Notary Public

My commission expires: 9-4-2013

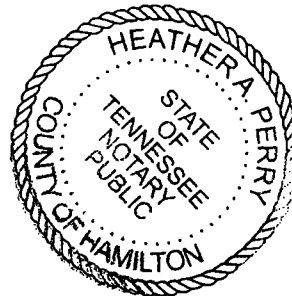


Table 1. Documents requested for withholding from public disclosure

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld (Notes 1 and 2)
Equipment Qualification Plan	3 006 501 E	Portions of Table 1, the Record of Revisions, and Appendices A to O, as marked by brackets [[]].	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of the identified commercially sensitive information, which is of value to a competitor because it defines the specific qualification envelope and test processes applied to SPINLINE 3 , which would enable them to make direct comparisons between the qualification processes and qualification envelopes for their safety I&C platform and the corresponding details for SPINLINE 3 .	Some or all of the following table and Sections in the appendices as marked by brackets [[]]: <ul style="list-style-type: none"> • Record of revisions • Table 1 • A.7 • B.7 • C.2, C.6 to C.9 • D.2, D.7 to D.9 • E.5, E.7 to E.9 • F.6 to F.10 • G.6 to G.10 • H.6 to H.10 • I.6 to I.10 • J.6 to J.10 • K.7 • L.5 • M.5 • N5, N7 to N9 • O.6 to O.10

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld (Notes 1 and 2)
System Setup and Checkout Test Procedure	3 010 294 D	Entire document (see Note 2).	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of commercially sensitive details of the specific qualification envelope and test processes applied to SPINLINE 3 hardware, which would enable competitors to make direct comparisons to the qualification processes and qualification envelopes for their safety I&C platforms.	Entire document
Seismic Test Procedure	301 028 8 D	Entire document (see Note 2).	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of commercially sensitive details of the specific qualification envelope and test processes applied to SPINLINE 3 hardware, which would enable competitors to make direct comparisons to the qualification processes and qualification envelopes for their safety I&C platforms.	Entire document
EMI/RFI Test Procedure	3 010 289 B	Entire document (see Note 2).	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of commercially sensitive details of the specific qualification envelope and test processes applied to SPINLINE 3 hardware, which would enable competitors to make direct comparisons to the qualification processes and qualification envelopes for their safety I&C platforms.	Entire document

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Operability Test Procedure	3 010 295 D	Entire document (see Note 2).	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of commercially sensitive details of the specific qualification envelope and test processes applied to SPINLINE 3 hardware, which would enable competitors to make direct comparisons to the qualification processes and qualification envelopes for their safety I&C platforms.	Entire document
Prudency Test Procedure	3 010 296 C	Entire document (see Note 2).	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of commercially sensitive details of the specific qualification envelope and test processes applied to SPINLINE 3 hardware, which would enable competitors to make direct comparisons to the qualification processes and qualification envelopes for their safety I&C platforms.	Entire document
Investigations Results of 2011 NRC Qualification Tests	3 018 630 A	Entire document (see Note 2).	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of aspects of the identified commercially sensitive information, which is of value to a competitor because it would enable them to make direct comparisons between the qualification processes and qualification envelopes for their safety I&C platform and the corresponding details for SPINLINE 3 .	Entire document

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld (Notes 1 and 2)
Summary Equipment Qualification Test Report	3 014 545 B	Table and portions of Appendices A to K, as marked by brackets [[]].	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of aspects of the identified commercially sensitive information, which is of value to a competitor because it would enable them to make direct comparisons between the qualification processes and qualification envelopes for their safety I&C platform and the corresponding details for SPINLINE 3 .	Some or all of the following Table and Sections in the appendices as marked by brackets [[]]: Table 13-1, 15 A.7 and A.8 B.7 and B.12 C.2, C.6, C.7, C.8, C.9, C.12 and C.13 D.2, D.7, D.8, D.9, D.12 and D.13 E.4, E.5, E.7, E.8, E.9, E.12 and E.13 F.6, F.7, F.8, F.9, F.10, F.12 and F.13 G.6, G.7, G.8, G.9, G.10, G.12 and G.13 H.6, H.7, H.8, H.9, H.10, H.12 and H.13 I.6, I.7, I.8, I.9, I.10, I.12 and I.13 J.6, J.7, J.8, J.9, J.10, J.12 and J.13 K.7, K.12 and K.13

Notes:

- (1) As required in NRC Information Notice (IN) 2009-07, documents containing proprietary information are marked with the word "Proprietary" at the top of the first page of the document and at the top of each page containing such information. In proprietary documents, brackets ("[[]]") denote proprietary information. In the proprietary document, the two brackets denoting the end of a proprietary segment of a report may appear one or more pages following the bracket indicating the start of the proprietary segment. In a nonproprietary edition of a proprietary document, the material within the brackets is removed.
- (2) As noted in IN 2009-07, in instances in which a nonproprietary version would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted.