



PROPRIETARY INFORMATION – WITHHOLD UNDER 10 CFR 2.390

10 CFR 50.90
10 CFR 2.390

April 11, 2014

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

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: Extended Power Uprate License Amendment Request – Supplement 24
Response to Request for Additional Information

Reference: 1. Exelon letter to the NRC, "License Amendment Request -
Extended Power Uprate," dated September 28, 2012
(ADAMS Accession No. ML122860201)

In accordance with 10 CFR 50.90, Exelon Generation Company, LLC (EGC) requested amendments to Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively (Reference 1). Specifically, the proposed changes would revise the Renewed Operating Licenses to implement an increase in rated thermal power from 3514 megawatts thermal (MWt) to 3951 MWt. During their technical review of the application, the NRC Staff identified the need for additional information. The NRC Staff provided draft requests for additional information (RAIs) by e-mails. Proprietary and non-proprietary versions of the requests and the responses to EMCB-SD-RAIs 47-51, 52a and 53-56 are provided in Attachments 1 and 2.

In addition, revisions to the replacement steam dryer topical reports (WCAPs) are provided to reflect the RAI responses and discussions with the NRC Staff during the review. These revised reports supersede those that were previously provided. Proprietary versions of the WCAPs identified below are included in Attachments 4 through 7 and non-proprietary versions are provided in Attachments 8 through 11.

The revised WCAPs are:

WCAP-17635, Rev 3, Comprehensive Vibration Assessment Program
WCAP-17649, Rev 2, ASME Code Stress Report
WCAP-17654, Rev 4, Peach Bottom Unit 2 Power Ascension Program Description for
Extended Power Uprate
WCAP-17655, Rev 4, Peach Bottom Unit 3 Power Ascension Program Description for
Extended Power Uprate

**Attachments 1 and 4 through 7 contain Proprietary Information.
When separated from these attachments, this document is decontrolled.**

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NRR

Westinghouse Electric Company (WEC) considers portions of the information provided in the Attachment 1 responses and in the topical reports in Attachments 4 through 7 to be proprietary and therefore exempt from public disclosure pursuant to 10 CFR 2.390. EGC considers portions of the information provided in the Attachment 1 responses to be proprietary and therefore exempt from public disclosure pursuant to 10 CFR 2.390. In accordance with 10 CFR 2.390 and in support of these requests for withholding, affidavits executed by WEC and EGC are provided in Attachment 3.

EGC has reviewed the information supporting a finding of no significant hazards consideration and the environmental consideration provided to the U. S. Nuclear Regulatory Commission in Reference 1. The supplemental information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. Further, the additional information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.


In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), EGC is notifying the Commonwealth of Pennsylvania and the State of Maryland of this application by transmitting a copy of this letter along with the non-proprietary attachments to the designated State Officials.

There are no regulatory commitments contained in this letter.

Should you have any questions concerning this letter, please contact Mr. David Neff at (610) 765-5631.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11th day of April 2014.

Respectfully,

A handwritten signature in black ink, appearing to read 'K. Borton', written over a horizontal line.

Kevin F Borton
Manager, Licensing – Power Uprate
Exelon Generation Company, LLC

Attachments:

1. Response to Request for Additional Information – EMCBS-SD - Proprietary
2. Response to Request for Additional Information – EMCBS-SD
3. Affidavits in Support of Request to Withhold Information
4. WCAP-17635, Rev 3, Comprehensive Vibration Assessment Program - Proprietary
5. WCAP-17649, Rev 2, ASME Code Stress Report - Proprietary
6. WCAP-17654, Rev 4, Peach Bottom Unit 2 Power Ascension Program Description for Extended Power Uprate - Proprietary
7. WCAP-17655, Rev 4, Peach Bottom Unit 3 Power Ascension Program Description for Extended Power Uprate - Proprietary
8. WCAP-17635, Rev 3, Comprehensive Vibration Assessment Program
9. WCAP-17609, Rev 2, ASME Code Stress Report
10. WCAP-17654, Rev 4, Peach Bottom Unit 2 Power Ascension Program Description for Extended Power Uprate
11. WCAP-17655, Rev 4, Peach Bottom Unit 3 Power Ascension Program Description for Extended Power Uprate

cc:	USNRC Region I, Regional Administrator	w/attachments
	USNRC Senior Resident Inspector, PBAPS	w/attachments
	USNRC Project Manager, PBAPS	w/attachments
	R. R. Janati, Commonwealth of Pennsylvania	w/o proprietary attachment
	S. T. Gray, State of Maryland	w/o proprietary attachment

Attachment 2

Peach Bottom Atomic Power Station Units 2 and 3

NRC Docket Nos. 50-277 and 50-278

Response to Request for Additional Information – EMCB-SD

Note

This attachment includes the non-proprietary version of the response; brackets identify where proprietary information has been redacted.

Response to Request for Additional Information

Mechanical and Civil Engineering Branch (EMCB) - Steam Dryer (SD)

By letter dated September 28, 2012, Exelon Generation Company, LLC (Exelon) submitted a license amendment request for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The proposed amendment would authorize an increase in the maximum power level from 3514 megawatts thermal (MWt) to 3951 MWt. The requested change, referred to as an extended power uprate (EPU), represents an increase of approximately 12.4 percent above the current licensed thermal power level.

The NRC staff has reviewed the information supporting the proposed amendment and has requested additional information.

The responses to EMCB-SD-RAIs 47-51, 52a and 53-56 are provided below.

EMCB-SD-RAI-47

In order to determine the actual stress cycles the dryer experiences at various strain and stress levels, please supply, as part of the PBAPS Unit 2 90-day report required by proposed license condition 2.C(15)(e), the cycles versus strain and stress histograms as described below:

- a) Develop the histograms using the measured strain amplitudes at CLTP and EPU. The histograms may be developed using rain-flow cycle counting in Fatigue Analysis (e.g., the ASTM E1049 standard). The measured cycles from the time history plots at on-dryer strain gage locations should be projected to cycles associated with the remaining life of the plant. Please select the strain gage location such that it correlates with the maximum stress location considered in Part (b) of this RAI.
- b) Develop the histograms using the predicted stresses at the maximum stress locations at EPU. The predicted stress cycles should be projected to cycles associated with the remaining life of the plant.

RESPONSE

- c) Histograms will be provided for two on-dryer strain gauges (one on the hood, one on the skirt) as part of the Peach Bottom Unit 2 90-day report required by proposed license condition 2.C(15)(e) at locations that correlate with the maximum stress locations considered in Part (b) of this RAI. The measured cycles at EPU from the time history plot at the gauge will be projected to cycles associated with the remaining life of the plant.
- d) Histograms will be provided for two maximum stress locations (one on the hood, one on the skirt) of the replacement steam dryer at EPU as part of the Peach Bottom Unit 2 90-day report required by proposed license condition 2.C(15)(e). The predicted stress cycles will be projected to cycles associated with the remaining life of the plant.

EMCB-SD-RAI-48

The B/Us for the strain gages are affected by the installation method used to attach the gages, the environment, and the length of the cables for the data acquisition system (DAS). Therefore, please provide quantitative justification for the assumed B/Us of the on-dryer strain gages. In particular, the justification should address installation methods (e.g., welding), temperature and pressure effects, as well as connectivity between the sensor and the data acquisition system. Provide references to any bench tests or other calibration methods used to determine the on-dryer strain gage B/Us.

RESPONSE

The on-dryer strain gage measurements at PBAPS will utilize highly-accurate, encapsulated strain gages (SGs) coupled to a customized, measurement-specific data acquisition system (DAS). Each strain gage features two sensing elements: one active (uniaxial measurement) and one passive (embedded in the tube, but not connected to the external structure). In this manner, each SG features inherent compensation for temperature and lead length when connected to the DAS in a Wheatstone half-bridge (WHB) configuration.

The SGs used for the on-dryer measurements are supplied with a gage factor (GF) specified on calibration data sheets for each SG. The SGs are also supplied with a set of precision compensation resistors to offset any slight differences between the active and passive elements, effectively creating a balanced Wheatstone half-bridge. The compensation resistors are individually customized and coded to each specified SG. The GF varies according to the length of mineral insulated (MI) cable that is exposed to a high-temperature (>25°F) environment.

The calibration data sheets provide plots and detailed expressions for the purpose of calculating the exact GF associated with each specific SG specifically addressing effects of instrument and MI cable temperature variations. The uncertainty in the GF for each SG is expressed as a standard deviation of the total value. The standard deviation for the PBAPS SGs is 0.05, or 4.5% to 5.1% of the reported nominal GF. For PBAPS, the GF associated with each specific SG will be calculated as part of the installation process using the manufacturer-provided expressions and imported directly into the DAS configuration files.

In addition to the inherent temperature and lead-length compensation provided by the WHB configuration and the SG-specific precision compensation resistors supplied by the SG manufacturer, the DAS has the capability to perform null balancing and shunt calibration accuracy tests prior to each collection period. For the typical dynamic acquisition, wherein data is obtained over a two-minute duration, these adjustments are performed prior to each collection period. The null balancing routine uses a series of hardware-based potentiometers to normalize or “zero” the signal for each channel, eliminating bridge imbalance due to apparent strain effects and lead wire temperature variation. The shunt calibration routine applies a known, fixed resistance in parallel across one arm of the WHB/WQB circuit, simulating a change in strain. The response during the test is observed and verified to be within a tight tolerance of expected values. A series of precision amplifiers are then used to make slight gain adjustments, ensuring uniform results across all channels. This procedure effectively compensates for any

remaining apparent strain effects that are not eliminated by the inherent temperature and lead length compensation of the SGs and WHB configuration.

The PBAPS RSD SGs will be installed using the same technique and installer as the Monticello RSD SGs. The installation procedure requires resistance measurements of the cable leads to ensure cable integrity during installation.

Therefore, effects of the installation method used to attach the SGs, the environment, and the length of the cables to the DAS have been addressed with regard to their impacts on bias and uncertainty of the dynamic SG measurements. The final uncertainty in the SG measurement is a function of the final installation but will be approximately five percent as defined by the strain gage manufacturer and noted above. Bias in the strain gage signals is compensated for within the DAS so as to reduce effects to negligible levels.

EMCB-SD-RAI-49

Responses to EMCB-SD-RAIs 8 and 15 (Reference 1) reveal that a []^{a,c} significantly increases alternating stresses and reduces stress ratios at several locations, particularly in the PBAPS Unit 2 dryer. []

explain the cause of this []^{a,c}]^{a,c} Please

RESPONSE

The final strain prediction is dependent on []^{a,c}. Although []

] ^{a,c}.

From further review of the []^{a,c} from the Peach Bottom Unit 2 []^{a,c} provided as Figure RAI-49-1, it is evident that []

] ^{a,c} Figure RAI-49-2 []

] ^{a,c}

The acoustic load near [

] ^{a,c}

[

] ^{b,c}

Figure RAI-49-1 [

] ^{a,c}

[

Figure RAI-49-2 [

] ^{a,c}

] ^{b,c}

EMCB-SD-RAI-50

The structural integrity of the PBAPS Unit 3 steam dryer during power ascension is based on [] ^{a,c} Please update the MSL limit curves for PBAPS Unit 3 to reflect the new MSL pressure spectra measured prior to power ascension above CLTP. Modify the MSL limit curve license condition for PBAPS Unit 3 accordingly, and provide a license condition to submit the updated MSL limit curves for PBAPS Unit 3 to the NRC.

RESPONSE

As noted in section 2.1.1 of WCAP-17655-P, "Peach Bottom Unit 3 Replacement Steam Dryer Power Ascension Program for Extended Power Uprate," Revision 3, the Unit 3 MSL limit curves will be updated based on the revised Unit 3 RSD analysis utilizing the Unit 2 on-dryer strain gauge based end-to-end Bias errors and Uncertainties (B/Us) at EPU conditions.

Proposed Unit 3 license condition (15)(a)1 will be modified as follows to include a requirement to submit the updated MSL limit curves for PBAPS Unit 3 to the NRC.

At least 90 days prior to the start of the Peach Bottom Unit 3 EPU outage, Exelon Generation Company shall revise the Peach Bottom Unit 3 replacement steam dryer

(RSD) analysis utilizing the Unit 2 on-dryer strain gauge based end-to-end Bias errors and Uncertainties (B/Us) at EPU conditions, and submit the information including the updated limit curves for Unit 3 to the NRC as a report in accordance with 10 CFR 50.4.

EMCB-SD-RAI-51

The response to EMCB-SD-RAI-15 (Reference 1) provides []^{a,c} for the power level of 102% EPU. The []^{a,c} for the **upper** dryer (Figs. RAI-15-45 to 54 and Figs. RAI-15-65 to 68 in Reference 1), show []^{a,c} whereas the []^{a,c} for the **lower** dryer (Figs. RAI-15-55 to RAI-15-64 in Reference 1) show []

[]^{a,c} Similar trends can be observed in WCAP 17590, Revision. 2, “PBAPS Unit 2 & 3 Replacement Steam Dryer (RSD) Acoustic Load Definition,” (Attachment 4 of Reference 1) where Figs. 3-10/11 and Figs. 3-18/19 show that adding the []^{a,c}

The above mentioned features seem counterintuitive because []

[]^{a,c} Please explain the reasons why the []^{a,c} noted above show []^{a,c} for the lower dryer, and []^{a,c} for the upper dryer.

RESPONSE

The final strain prediction is dependent on []^{a,c} Although the []

[]^{a,c}

For []

[]^{a,c}

For []

[

] ^{a,c}

Figure RAI-51-1 [

[

] ^{a,c}

] ^{b,c}

Figure RAI-51-2 [

] ^{a,c}

] ^{b,c}

[

Figure RAI-51-3 [

] ^{a,c}

] ^{b,c}

EMCB-SD-RAI-52

In WCAP-17609-P, Revision 2, "PBAPS Unit 2 & 3 RSD Structural Evaluation for High-cycle Acoustic Loads," (Attachment 5 of Reference 2), hydrodynamic damping [^{a,c}] was introduced in the dynamic analysis of the dryer. However, no information was provided to substantiate the amount of damping which was introduced in the analysis. Please provide the following:

- a) Explain the basis of selecting the amount of hydrodynamic damping introduced [^{a,c}] and provide the necessary information which substantiates the procedure and the value of the damping ratio used in the analysis.
- b) Provide the Minimum Alternating Stress Ratio (MASR) for the [^{a,c}] if no credit is taken for hydrodynamic damping. The NRC staff notes that the MASR for PBAPS Unit 2 is [^{a,c}] with hydrodynamic damping.

RESPONSE

- a) In addition to [

] ^{a,c}.

This approach is based on a [

] ^{a,c}

The appropriateness of the [

] ^{a,c}

b) Response to Item b) to be provided later.

EMCB-SD-RAI-53

In WCAP-17609-P, Revision 2, the fluid-structure interaction phenomenon between the immersed portion of the skirt and the reactor water was modeled [

] ^{a,c} The validity of this approach and the selected [] ^{a,c} are not substantiated in WCAP-17609-P, Revision 2. Generally, the

] ^{a,c} Please provide the following additional information:

- a) Demonstrate the appropriateness of the approach that you used.
- b) Substantiate the [] ^{a,c} used for the skirt and belt below the water.

RESPONSE

The correlations in Reference RAI-53-1 were used to determine the [

] ^{a,c}

$\mathbf{J}^{a,c}$

RAI-53-1 [

 $\mathbf{J}^{a,c}$

Question deleted.

The response to Reference 3, "NRC Issue 2- Steam dryer Analysis - EMCB Supplemental Information Request 3," contains a discussion on the consideration of loads due to [] in the steam dryer analysis.

Please provide clarifications for the following questions related to the consideration of the [[]] in the PBAPS Units 2 and 3 replacement steam dryer (RSD) analysis:

1. (a) A simple sketch of the structural model of the []
[] Please show the global axes orientation for the model.
(b) Clarify if the global X and Z referred to in the Reference 3 response represent horizontal axes.
(c) Clarify if the measured []
[] are in the horizontal direction. Provide typical peak amplitude values for the measured []
2. (a) Provide the amplitudes of the []
[]^{a,c} to the steam dryer structural model.
(b) Clarify if the []
[]^{a,c} of the dryer.
3. The []
[] was used to determine the []
[] in the PBAPS Units 2 and 3 steam dryers.
(a) Clarify if the []
dryer lugs due to [] []
(b) Clarify if the []
[] dryer stress in both PBAPS dryers is based on []
[] applied to the PBAPS RSD structural model.

RESPONSE

- 1(a) The structural model used to assess the []

[] A graphical representation of the final model is shown below (Figure RAI-55-1). The global orientation is noted where the Y-axis is the vertical axis and the X-axis and Z-axis are the orthogonal horizontal axes.

[[

Figure RAI-55-1

]]

[[

]]

- 1(b) The global X and Z axis referred to in the subject response correspond to the horizontal axes, as illustrated in the above figure.
- 1(c) The measured vibrations are in terms of [[

]]

Table RAI-55-1

[[

]]

The maximum X-axis velocity [[]] and the maximum Z-axis velocity [[]] were separately used as the vibratory inputs to the model and the resulting accelerations at the RSD support lugs were combined by absolute sum.

2(a). The amplitude of the []^{a,c} applied at the []

]^{a,c}

2(b) The []^{a,c}

3. The [[]] data was not used to determine the [[]] in the PBAPS Units 2 and 3 steam dryers. Rather, the [[]]

]] predicted for the Peach Bottom RSD.

3(a) The [[]] was based upon data acquired from strain gages installed on the [[]] The measured strain plots associated with the strain gages were reviewed to identify the magnitude of the strain occurring at the [[]] This strain was converted yielding a stress of approximately [[]]

3(b) The [[]] dryer stress was the approximate stress determined from the analyses of the strain gages on the [[]] This stress was generated only for [[]]

]] where data was readily available.

PBAPS EPU-EMCB-SD-RAI-56

Both PBAPS units will contain a new polygonal-shaped, vane bank, steam dryer, to support the EPU. In order to compare the []^{a,c} of the PBAPS dryers, with steam dryers of similar design operating in the Nordic region (Nordic Plants A through H), please provide the following information (Note – completed table is provided in the response below):

RESPONSE

The available Nordic plant information is provided in Table RAI-56-1. Note that data in Columns 1 through 6 was included in the RAI. The data in Columns 7 through 12 was completed in response to this RAI.

**Table RAI-56-1
Nordic Dryer and Operating Plant Information**

]^{a,c}

REFERENCES

- 1) Exelon letter to U.S. Nuclear Regulatory Commission, dated February 28, 2014, "Extended Power Uprate License Amendment Request - Supplement 21, Response to Request for Additional Information," (contains proprietary information - ADAMS Accession No. ML14035A158 & ML14035A159)
- 2) Exelon letter to U.S. Nuclear Regulatory Commission, dated March 10, 2014, "Extended Power Uprate License Amendment Request - Supplement 22, Response to Request for Additional Information," (contains proprietary information - ADAMS Accession No. ML14072A022).
- 3) Exelon letter to U.S. Nuclear Regulatory Commission, dated February 15, 2013, "Supplemental Information and Corrections Supporting Request for License Amendment Request - Extended Power Uprate Supplement 1, Attachment 9 (NRC Issue 2- Steam Dryer Analysis, EMCB Supplemental Information Request 3," (contains proprietary information - ADAMS Accession No. ML13051A032).

Attachment 3

Peach Bottom Atomic Power Station Units 2 and 3

NRC Docket Nos. 50-277 and 50-278

AFFIDAVITS

Note

Attachment 1 and Attachment 4 through 7 contain proprietary information as defined by 10 CFR 2.390. WEC, as the owner of the proprietary information, has executed the enclosed affidavits, which identify that the proprietary information has been handled and classified as proprietary, is customarily held in confidence, and has been withheld from public disclosure. The proprietary information has been faithfully reproduced in the attachment such that the affidavit remains applicable.

Attachment 1 also contains EGC proprietary information as defined by 10 CFR 2.390. EGC, as the owner of the proprietary information, has executed the enclosed affidavit, which identifies that the proprietary information has been handled and classified as proprietary, is customarily held in confidence, and has been withheld from public disclosure.



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CAW-14-3943

April 9, 2014

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Attachment 1 "Response to Request for Additional Information – EMCBS-SD - Proprietary,"
attached to Exelon Generation submittal to the NRC "Extended Power Uprate License
Amendment Request – Supplement 24, Response to Request for Additional Information"

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-14-3943 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 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Exelon Generation.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse Affidavit should reference CAW-14-3943 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read 'JA Gresham', written over a horizontal line.
James A. Gresham, Manager
Regulatory Compliance

Enclosures

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF BUTLER:

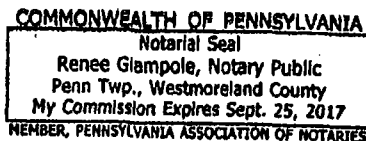
Before me, the undersigned authority, personally appeared Bradley F. Maurer, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit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

BF Maurer

Bradley F. Maurer, Principal Engineer
Plant Licensing

Sworn to and subscribed before me
this 9th day of April 2014

Renee Giampole
Notary Public



- (1) I am Principal Engineer, Plant Licensing, in Engineering, Equipment and Major Projects, 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 Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse 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 2.390 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 constitute Westinghouse policy and provide 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.
- (iii) 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.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (v) 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.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in Attachment 1 "Response to Request for Additional Information – EMCB-SD - Proprietary," attached to Exelon Generation submittal to the NRC "Extended Power Uprate License Amendment Request – Supplement 24, Response to Request for Additional Information" for submittal to the Commission, being transmitted by Exelon Generation letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the review of the Replacement Steam Dryer design and analysis which is a part of the Extended Power Uprate License Amendment Request for Peach Bottom Units 2 and 3, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
 - (i) Assist Exelon Generation in obtaining NRC review of the Peach Bottom Atomic Power Station Units 2 and 3 License Amendment Request.
- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of this information to its customers for purposes of plant specific replacement steam dryer analysis for licensing basis applications.
 - (ii) Its use by a competitor would improve their competitive position in the design and licensing of a similar product for BWR steam dryer analysis methodology.
 - (iii) 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 technical 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.

Further the deponent sayeth not.

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 2.390 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 2.390(b)(1).

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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 2.390 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.



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Proj letter: WEC-PCH-RSD-14-085

CAW-14-3942

April 9, 2014

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WCAP-17635-P – Enclosure 17A, Revision 3, "Peach Bottom Atomic Power Station Unit 2 and Unit 3 Replacement Steam Dryer Comprehensive Vibration Assessment Program (CVAP)" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-14-3942 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 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Exelon Generation.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse Affidavit should reference CAW-14-3942 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read "JA Gresham", written over a horizontal line.

James A. Gresham, Manager

Regulatory Compliance

Enclosures

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

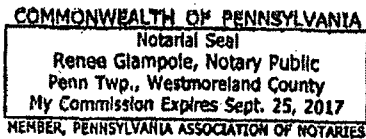
Before me, the undersigned authority, personally appeared Bradley F. Maurer, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit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

BF Maurer

Bradley F. Maurer, Principal Engineer
Plant Licensing

Sworn to and subscribed before me
this 9th day of April 2014

Renee Glampole
Notary Public



- (1) I am Principal Engineer, Plant Licensing, in Engineering, Equipment and Major Projects, 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 Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse 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 2.390 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 constitute Westinghouse policy and provide 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.
- (iii) 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.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (v) 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.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WCAP-17635-P – Enclosure 17A, Revision 3, "Peach Bottom Atomic Power Station Unit 2 and Unit 3 Replacement Steam Dryer Comprehensive Vibration Assessment Program (CVAP)" (Proprietary), dated April 2014, for submittal to the Commission, being transmitted by Exelon Generation letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the review of the Replacement Steam Dryer design and analysis which is a part of the Extended Power Uprate License Amendment Request for Peach Bottom Units 2 and 3, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
 - (i) Assist Exelon Generation in obtaining NRC review of the Peach Bottom Atomic Power Station Units 2 and 3 License Amendment Request.
- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of this information to its customers for purposes of plant specific replacement steam dryer analysis for licensing basis applications.
 - (ii) Its use by a competitor would improve their competitive position in the design and licensing of a similar product for BWR steam dryer analysis methodology.
 - (iii) 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 technical 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.

Further the deponent sayeth not.



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Proj letter: WEC-PCH-RSD-14-084

CAW-14-3941

April 9, 2014

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WCAP-17649-P, Revision 2, "Peach Bottom Units 2 and 3 ASME Code Stress Report"
(Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-14-3941 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 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Exelon Generation.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse Affidavit should reference CAW-14-3941 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. A. Gresham", written over a horizontal line.

James A. Gresham, Manager

Regulatory Compliance

Enclosures

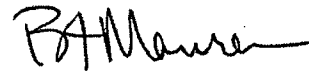
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

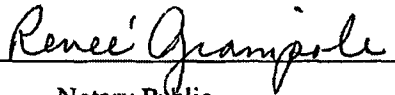
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared Bradley F. Maurer, 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:

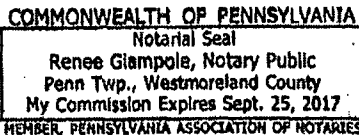


Bradley F. Maurer, Principal Engineer
Plant Licensing

Sworn to and subscribed before me
this 9th day of April 2014



Notary Public



- (1) I am Principal Engineer, Plant Licensing, in Engineering, Equipment and Major Projects, 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 Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse 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 2.390 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 constitute Westinghouse policy and provide 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.
- (iii) 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.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (v) 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.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WCAP-17649-P, Revision 2, "Peach Bottom Units 2 and 3 ASME Code Stress Report" (Proprietary), dated April 2014, for submittal to the Commission, being transmitted by Exelon Generation letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the review of the Replacement Steam Dryer design and analysis which is a part of the Extended Power Uprate License Amendment Request for Peach Bottom Units 2 and 3, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
 - (i) Assist Exelon Generation in obtaining NRC review of the Peach Bottom Atomic Power Station Units 2 and 3 License Amendment Request.
- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of this information to its customers for purposes of plant specific replacement steam dryer analysis for licensing basis applications.
 - (ii) Its use by a competitor would improve their competitive position in the design and licensing of a similar product for BWR steam dryer analysis methodology.
 - (iii) 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 technical 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.

Further the deponent sayeth not.



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CAW-14-3939

April 9, 2014

**APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE**


**Subject: WCAP-17654-P, Revision 4, "Peach Bottom Unit 2 Replacement Steam Dryer Power
Ascension Program Description for Extended Power Uprate" (Proprietary)**

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-14-3939 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 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Exelon Generation.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse Affidavit should reference CAW-14-3939 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Very truly yours,


James A. Gresham, Manager
Regulatory Compliance

Enclosures

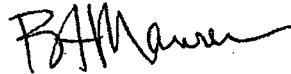
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

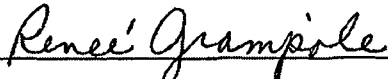
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared Bradley F. Maurer, 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:

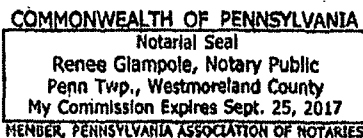


Bradley F. Maurer, Principal Engineer
Plant Licensing

Sworn to and subscribed before me
this 9th day of April 2014



Notary Public



- (1) I am Principal Engineer, Plant Licensing, in Engineering, Equipment and Major Projects, 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 Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse 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 2.390 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.
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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.

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 - (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.
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 - (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.
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 - (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.
-
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
 - (v) 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.
 - (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WCAP-17654-P, Revision 4, "Peach Bottom Unit 2 Replacement Steam Dryer Power Ascension Program Description for Extended Power Uprate" (Proprietary), dated April 2014, for submittal to the Commission, being transmitted by Exelon Generation letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the review of the Replacement Steam Dryer design and analysis which is a part of the Extended Power Uprate License Amendment Request for Peach Bottom Units 2 and 3, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
 - (i) Assist Exelon Generation in obtaining NRC review of the Peach Bottom Atomic Power Station Units 2 and 3 License Amendment Request.
- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of this information to its customers for purposes of plant specific replacement steam dryer analysis for licensing basis applications.
 - (ii) Its use by a competitor would improve their competitive position in the design and licensing of a similar product for BWR steam dryer analysis methodology.
 - (iii) 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 technical 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.

Further the deponent sayeth not.



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U.S. Nuclear Regulatory Commission
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Proj letter: WEC-PCH-RSD-14-083

CAW-14-3940

April 9, 2014

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WCAP-17655-P, Revision 4, "Peach Bottom Unit 3 Replacement Steam Dryer Power
Ascension Program Description for Extended Power Uprate" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-14-3940 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 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Exelon Generation.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse Affidavit should reference CAW-14-3940 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. A. Gresham', written over a horizontal line.

James A. Gresham, Manager

Regulatory Compliance

Enclosures

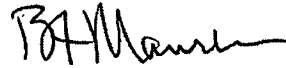
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

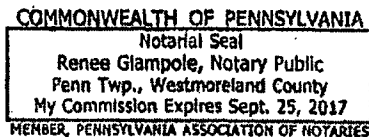
Before me, the undersigned authority, personally appeared Bradley F. Maurer, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit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



Bradley F. Maurer, Principal Engineer
Plant Licensing

Sworn to and subscribed before me
this 9th day of April 2014


Notary Public



- (1) I am Principal Engineer, Plant Licensing, in Engineering, Equipment and Major Projects, 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 Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse 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 2.390 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 constitute Westinghouse policy and provide 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.
- (iii) 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.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (v) 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.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WCAP-17655-P, Revision 4, "Peach Bottom Unit 3 Replacement Steam Dryer Power Ascension Program Description for Extended Power Uprate" (Proprietary), dated April 2014, for submittal to the Commission, being transmitted by Exelon Generation letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the review of the Replacement Steam Dryer design and analysis which is a part of the Extended Power Uprate License Amendment Request for Peach Bottom Units 2 and 3, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
 - (i) Assist Exelon Generation in obtaining NRC review of the Peach Bottom Atomic Power Station Units 2 and 3 License Amendment Request.
- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of this information to its customers for purposes of plant specific replacement steam dryer analysis for licensing basis applications.
 - (ii) Its use by a competitor would improve their competitive position in the design and licensing of a similar product for BWR steam dryer analysis methodology.
 - (iii) 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 technical 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.

Further the deponent sayeth not.

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 2.390 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 2.390(b)(1).

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 2.390 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.

AFFIDAVIT

I, Craig W. Lambert, Vice President Power Upgrades, Exelon Generation Company, LLC (Exelon), do hereby affirm and state:

1. I am an officer of Exelon authorized to execute this affidavit on its behalf. I am further authorized to apply for the withholding of information from disclosure.
2. The information sought to be withheld is:
 - i) Response to Request for Additional Information EMCB-SD-RAI-55, included in EPU LAR Supplement 24, dated April 11, 2014.
3. This information constitutes proprietary information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR 2.390(a)(4), because:
 - i. This information is marked as "Proprietary Information in Accordance with 10 CFR 2.390" and is being held in confidence by Exelon.
 - ii. This information is of a type that is held in confidence by Exelon, and there is rational basis for doing so because the information contains methodology, data, and supporting information identified as "Proprietary Information."
 - iii. This information is being transmitted to the NRC in confidence.
 - iv. This information sought to be withheld, to the best of my knowledge and belief, is not available in public sources and no public disclosure has been made.
 - v. Public disclosure of this information could create substantial harm to Exelon's business interests because it expended considerable resources in developing and protecting the information.
4. Accordingly, Exelon requests that the designated document be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4).

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Melody L. Decatur, Notary Public
Peach Bottom Twp, York County
My commission expires January 21, 2018

Melody L. Decatur
Subscribed and sworn before me,
A Notary Public in and for the
Commonwealth of Pennsylvania
this 11 day of April 2014

Craig W. Lambert
Craig W. Lambert
Vice President Power Upgrades
Exelon Generation Company, LLC