

NRC FORM 7 (11-2012) 10 CFR 110		U. S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3150-0027 Estimated burden per response to comply with this mandatory collection request: 2.4 hours. This submittal is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the Information Services Branch (1-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to infocollections.Resource@nrc.gov , and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0027), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.		EXPIRES: (11/30/2016)	
APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (See Instructions on Pages 4 and 5)							
PART A: FOR NRC USE ONLY		<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC		DATE RECEIVED AUG 25 2015			
LICENSE NUMBER XR 169/02		DOCKET NUMBER 11000472		ADAMS/ACCESSION NUMBER ML15164A003			
PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)							
1. NAME AND ADDRESS OF APPLICANT/LICENSEE Westinghouse Electric Company LLC 1000 Westinghouse Drive Cranberry Twp., PA 16066		1a. NAME OF APPLICANT'S CONTACT Erin P. McBride-Lovas		1b. APPLICANT'S REFERENCE NUMBER EML-15-042			
		1c. PHONE NUMBER (724) 940-8198		1d. FAX NUMBER (724) 940-8508			
		1e. E-MAIL ADDRESS mcbride@westinghouse.com					
2. TYPE OF ACTION REQUESTED (Check One)							
<input type="checkbox"/> EXPORT (Parts B, C, E)		<input type="checkbox"/> IMPORT (Parts B, D, E)		<input checked="" type="checkbox"/> AMENDMENT/RENEWAL Current License Number: XR 169 Amend. 01		<input type="checkbox"/> CONSENT REQUEST (Parts B, C) Current License Number:	
3. CONTRACT NUMBER(S)		4. FIRST SHIPMENT DATE		5. LAST SHIPMENT DATE		6. PROPOSED EXPIRATION DATE 7/23/2035	
PART C. TO BE COMPLETED FOR EXPORT LICENSES, AMENDMENTS, OR RENEWALS (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)							
7. NAME(S) / ADDRESS(ES) OF SUPPLIERS AND/OR OTHER PARTIES TO THE EXPORT Delete: Stone & Webster Asia, Inc. Stone & Webster International Inc. 4171 Essen Lane Baton Rouge, LA 70809 Replace with: CB&I Stone & Webster Asia, Inc. CB&I Stone & Webster International Inc. 4171 Essen Lane Baton Rouge, LA 70809		8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S)		9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S)			
7a. FUNCTION(S) PERFORMED/SERVICE(S) PROVIDED		8a. INTERMEDIATE USE(S)		9a. ULTIMATE END USE(S)			
10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS; FOR NUCLEAR EQUIPMENT INCLUDE TOTAL DOLLAR VALUE OF EQUIPMENT FOR EXPORT Nuclear reactor systems and components (10 CFR 110, Appendix A, Paragraphs (1)-(11)) and associated equipment and engineering services for construction, maintenance, and operation of eight 900 to 1500 MWe pressurized water reactors (AP1000 design). Four units are authorized for export to the San Men site in Zhejiang Province, and four units are for the Haiyang site in Shangdong Province.		10a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)		10b. MAX ENRICHMENT OR WGT %		10c. MAX ISOTOPE WGT (KG)	
11. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)							

NRC FORM 7
(11-2012)
10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR NRC EXPORT OR IMPORT
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

LICENSE NUMBER XB 169/02	DOCKET NUMBER 110054-72	ADAMS ACCESSION NUMBER ML15164A003	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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PART D. TO BE COMPLETED FOR IMPORT LICENSES, AMENDMENTS, OR RENEWALS

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12. NAME(S) / ADDRESS(ES) OF FOREIGN SUPPLIERS AND/OR OTHER PARTIES TO IMPORT	13. NAME(S) / ADDRESS(ES) OF INTERMEDIATE CONSIGNEE(S)	14. NAME(S) / ADDRESS(ES) OF ULTIMATE U. S. CONSIGNEE(S)
12a. NRC EXPORT LICENSE NUMBER(S) (if applicable)	13a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	14a. LICENSE NUMBER(S) / EXPIRATION DATE(S)
	13b. INTERMEDIATE USE(S)	14b. ULTIMATE END USE(S)
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)	15b. MAX ENRICHMENT OR WGT %
		15c. MAX ISOTOPE WGT (KG)

16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)

PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR CONSENT REQUEST(S)

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
18. CERTIFICATION: I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.	
18a. PRINT NAME AND TITLE OF AUTHORIZED OFFICIAL Erin P. McBride-Lovas, Trade Compliance Specialist	18b. SIGNATURE -- AUTHORIZED OFFICIAL 
	18c. DATE 6/11/15

SF rec'd
AUG 25 2015

NRC FORM 7
(11-2012)
10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR NRC EXPORT OR IMPORT
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

LICENSE NUMBER XP 169/02	DOCKET NUMBER 1005472	ADAMS ACCESSION NUMBER ML15164AC05	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

As requested by the NRC, we have included a contact name and details for both the Sanmen and Haiyang sites in China (listed below).

[REDACTED] This contact information is proprietary information and is to remain confidential as per the attached Application for Withholding Proprietary Information from Public Disclosure and an Affidavit in conformance with the requirements of 10 CFR Section 2.390.

[REDACTED]

SF Rec'd
AUG 25 2015



Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, PA 16066
USA

Deputy Director
Office of International Programs
11555 Rockville Pike
Mail Station 04D2
U.S. Nuclear Regulatory Commission
Rockville, Maryland 20852-2738

Direct tel: 724-940-8198
Direct fax: 724-940-8508
e-mail: mcbride@westinghouse.com

Your ref: Renewal and Amendment of
XR 169, Amendment Number 1
Our ref: EML-15-053

6/11/2015

RE: Renewal and Amendment of XR 169, Amendment Number 1

Dear Deputy Director,

Please find an NRC export license application, enclosed, to both renew and amend the current export license XR 169, Amendment Number 1. This application requests to renew this license past its current expiry date of July 23, 2015 until 20 years from that date.

As the license currently covers the export of nuclear systems and components under 10 CFR 110, Appendix A, Paragraphs (1)-(9), we would like to change that to include the now expanded Appendix A, Paragraphs (1)-(11). We have also asked to include an additional two (2) units at both the Sanmen and Haiyang sites for a total of four (4) units at each site. Additionally, we are requesting to delete Stone & Webster Asia, Inc. from "Other Parties to Export" and replace it with its new legal name, CB&I Stone & Webster Asia, Inc. Finally, we are requesting that our address be updated to reflect our current location under the "Licensee" box.

As requested by the NRC, we have included a contact name and details for both the Sanmen and Haiyang sites in China, [REDACTED]

[REDACTED]. This contact information is proprietary information and is to remain confidential as per the attached Application for Withholding Proprietary Information from Public Disclosure and an Affidavit in conformance with the requirements of 10 CFR Section 2.390. No other changes to the license are requested at this time.

A check for \$1,400 to cover the NRC export license renewal and amendment application fee is also enclosed.

Should there be any questions on this request, please call the undersigned at 724-940-8198.

Thank you for your attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "E. P. McBride-Lovas", followed by a horizontal flourish.

Erin P. McBride-Lovas
Trade Compliance Group
Legal Department
Westinghouse Electric Company LLC

A large rectangular area of the document has been completely redacted with black ink.



Westinghouse Electric Company
Engineering, Equipment and Major Projects
1000 Westinghouse Drive, Building 3
Cranberry Township, Pennsylvania 16066
USA

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

Direct tel: (412) 374-4643
Direct fax: (724) 940-8560
e-mail: greshaja@westinghouse.com

AW-15-4204

June 11, 2015

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

Subject: EML-15-053, "Renewal and Amendment of XR 169, Amendment 01" and NRC Form 7,
"Application for NRC Export or Import License, Amendment, Renewal, or Consent
Request(s)" (Proprietary)

Reference: Letter from James A. Gresham to Document Control Desk, LTR-NRC-15-47 dated
June 11, 2015

The Application for Withholding Proprietary Information from Public Disclosure is submitted by
Westinghouse Electric Company LLC (Westinghouse), pursuant to the provisions of paragraph (b)(1) of
Section 2.390 of the Commission's regulations. It contains commercial strategic information proprietary
to Westinghouse and customarily held in confidence.

The proprietary information for which withholding is being requested is identified in the proprietary
version of the subject report. In conformance with 10 CFR Section 2.390, Affidavit AW-15-4204
accompanies this Application for Withholding Proprietary Information from Public Disclosure, setting
forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information which is proprietary to Westinghouse
be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's
regulations.

Correspondence with respect to the proprietary aspects of the application for withholding or the
accompanying Affidavit should reference AW-15-4204 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".

James A. Gresham, Manager
Regulatory Compliance

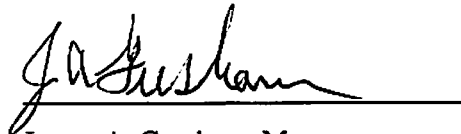
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

I, James A. Gresham, am 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 my knowledge, information, and belief.

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

James A. Gresham, Manager
Regulatory Compliance

- (1) I am Manager, Regulatory Compliance, 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 contained in EML-15-053, "Renewal and Amendment of XR 169, Amendment 01" and NRC Form 7, "Application for NRC Export or Import License, Amendment, Renewal, or Consent Request(s)" (Proprietary), for submittal to the Commission, being transmitted by Westinghouse letter, LTR-NRC-15-47 and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk.
- (a) This information is part of that which will enable Westinghouse to obtain authorization to:
- (i) Maintain its competitive position against its competitors, which if able to learn this commercial and financial information would reduce their

expenditure of resources or improve their competitive position in the marketing, sale, and shipment of similar products.

- (ii) Maintain its competitive position against its competitors, which if able to learn this commercial and financial information would know cost or price information, production capacities, customers, or commercial strategies of Westinghouse, its customers or suppliers.
- (b) Further this information has substantial commercial value as follows:
- (i) It is information that reveals Westinghouse customers, prices, products sold particular customers and other market sensitive information. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services.
 - (ii) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense and/or permitting the competitor to consider Westinghouse pricing and marketing strategies generally and for particular customers.
 - (iii) 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 sufficient to undermine any existing Westinghouse competitive advantage.
 - (iv) 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.
 - (v) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage in the marketing and sale of its current portfolio of products and services.

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 competing products for commercial power reactors with full knowledge of Westinghouse's pricing and marketing strategies.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary versions of documents furnished to the NRC in connection with the NRC export license renewal and amendment application prepared by Westinghouse as described in Westinghouse letter, "Renewal and Amendment of XR 169, Amendment 01" and NRC Form 7.

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, each page has been marked to indicate it is proprietary and must be withheld from public disclosure.

COPYRIGHT NOTICE

To the extent the documents transmitted herewith each bear a Westinghouse proprietary notice, the NRC is permitted to make the number of copies of the information contained in this application which are necessary for its internal use in connection with the internal review conducted as described in Westinghouse letter, "Renewal and Amendment of XR 169, Amendment 01" and NRC Form 7. Copies made by the NRC must include the proprietary notice in all instances.