



Program Management Office
1000 Westinghouse Drive
Cranberry Township, PA 16066

Project Number 694

July 2, 2015

OG-15-273

US Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: PWR Owners Group
Transmittal of WCAP-17788, Volume 4: "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage"

Dear Mr. Rowley,

The Pressurized Water Reactor Owner's Group (PWROG) is transmitting WCAP-17788, Volume 4, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage".

Enclosed are:

1. Four copies of WCAP-17788-P, Volume 4, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage" (Proprietary)
2. Four copies of WCAP-17788-NP, Volume 4, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage" (Non-Proprietary)

Enclosure 3 contains Westinghouse authorization letter LTR-NRC-15-57, the accompanying affidavit, Proprietary Information Notice, and Copyright Notice.

The purpose of Volume 4 of this Topical Report is to provide the details of the thermal-hydraulic analysis completed to assess the reactor coolant system response to core inlet blockage due to the collection of debris following a postulated large hot leg break loss-of-coolant accident.

As Enclosure 1 contains information proprietary to Westinghouse Electric Company LLC, it is supported by an Affidavit signed by Westinghouse, the owner of the information. The Affidavit sets forth the basis on which the information may be withheld from public disclosure by the

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Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations.

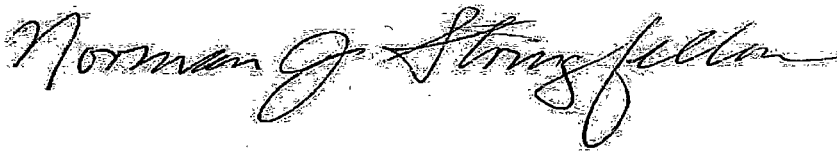
Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference LTR-NRC-15-57 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.

Please note a request for exemption from NRC Review fees for WCAP-17788 was previously sent via OG-15-63 and further clarified by OG-15-82.

If you have any questions, please do not hesitate to contact me at (205) 992-7037 or Mr. W. Anthony Nowinowski, Program Manager of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely,



Jack Stringfellow, Chairman
PWR Owners Group

NJS:jdb:rfr

- Enclosures (3):
1. WCAP-17788-P, Volume 4, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage" (Proprietary)
 2. WCAP-17788-NP, Volume 4, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage" (Non-Proprietary)
 3. One copy of the Application for Withholding, LTR-NRC-15-57 (Non-proprietary) with the accompanying affidavit, Proprietary Information Notice and Copyright Notice

cc: PWROG Management Committee
PWROG SEE Subcommittee
PWROG Licensing Subcommittee
PWROG PMO

J. D. Andrachek – Westinghouse
J. A. Gresham – Westinghouse
T. S. Andreychek – Westinghouse
M. Cerrone – Westinghouse
T. Croyle – Westinghouse
J. Maruschak - Westinghouse
R. Schomaker – AREVA NP



Westinghouse Electric Company
1000 Westinghouse Drive
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

LTR-NRC-15-57

July 1, 2015

Subject: Submittal of WCAP-17788-P/-NP, Volume 4, Revision 0, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage" (Proprietary/Non-Proprietary)

Enclosed are the proprietary and non-proprietary versions of WCAP-17788, Volume 4, Revision 0, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage," dated July 2015, submitted for review and approval under the NRC's licensing topical report program for referencing in licensing actions.

Also enclosed are:

1. An Application for Withholding Proprietary Information from Public Disclosure, AW-15-4220 (Non-Proprietary) with Proprietary Information Notice and Copyright Notice
2. An Affidavit (Non-Proprietary).

This submittal contains proprietary information of Westinghouse Electric Company LLC. In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Commission's regulations, we are enclosing with this submittal an Application for Withholding Proprietary Information from Public Disclosure and an Affidavit. The Affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference AW-15-4220 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.

W.A. Gresham / FOR

James A. Gresham, Manager
Regulatory Compliance

Enclosures

bcc: James A. Gresham
Cheryl Robinson
Anne M. Stegman



Westinghouse Electric Company
1000 Westinghouse Drive
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-15-4220

July 1, 2015

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WCAP-17788-P, Volume 4, Revision 0, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage" (Proprietary)

Reference: Letter from James A. Gresham to Document Control Desk, LTR-NRC-15-57, dated July 1, 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-15-4220 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 this Application for Withholding or the accompanying Affidavit should reference AW-15-4220 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.

W. A. Gresham / FOR

James A. Gresham, Manager
Regulatory Compliance

AW-15-4220

July 1, 2015

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

I, Henry A. Sepp, am authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "H. A. Sepp", is written over a horizontal line.

Henry A. Sepp, Director

CRE-Systems and Components Engineering

- (1) I am Director, CRE-Systems and Components Engineering, 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-17788-P, Volume 4, Revision 0, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage" (Proprietary), dated July 2015, for submittal to the Commission, being transmitted by Westinghouse letter, LTR-NRC-15-57, 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 Westinghouse's request for NRC approval of WCAP-17788-P, Volume 4, Revision 0 and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
 - (i) Obtain NRC approval of WCAP-17788, Volume 4, Revision 0, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Thermal-Hydraulic Analysis of Large Hot Leg Break with Simulation of Core Inlet Blockage."
- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of similar information to its customers for the purpose of providing information that can be used to gain margin in terms of allowable fiber loads at the core inlet in a post-LOCA scenario.
 - (ii) Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
 - (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 evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

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

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

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are the proprietary and non-proprietary versions of a document 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.