



PROPRIETARY INFORMATION – WITHHOLD UNDER 10 CFR 2.390

10 CFR 50.4
10 CFR 2.390

July 15, 2015

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

Peach Bottom Atomic Power Station, Unit 2
Renewed Facility Operating License Nos. DPR-44
NRC Docket Nos. 50-277

Subject: Error Identified in Letter from Exelon to NRC

- Reference:
- 1) Exelon Letter to NRC, "Extended Power Uprate: Response to Replacement Steam dryer Request for Additional information," dated May 15, 2015 (ADAMS Accession No. ML15135A402)
 - 2) NRC Letter to Exelon, "Peach Bottom Atomic Power Station, Unit 2 – Approval of Revision to Methodology for establishing Replacement Steam Dryer Strain Limits (TAC No. MF4792)," dated May 19, 2015 (ADAMS Accession No. ML15127A208)

This letter is to inform the NRC of an error identified in a letter from Exelon Generation Company, LLC (Exelon) to the NRC dated May 15, 2015 (Reference 1). The error regarding the Peach Bottom Atomic Power Station (PBAPS) Unit 2 predicted strain ratios provided in response to a request for additional information (RAI-11) was discovered by Westinghouse Electric Company (WEC) during their evaluation of the PBAPS Unit 2 replacement steam dryer (RSD) strain gage data at full extended power uprate conditions. Attachment 1 to this letter provides a description of the error.

**Attachment 1 contains Proprietary Information.
When separated from Attachment 1, this document is decontrolled.**

WEC considers portions of the information provided in Attachment 1 proprietary and, therefore, exempt from public disclosure pursuant to 10 CFR 2.390. In accordance with 10 CFR 2.390 and in support of this request for withholding, an affidavit executed by WEC is provided in Attachment 3.

There are no regulatory commitments contained in this letter.

Should you have any questions concerning this letter call me at (610-765-5528)

Respectfully,



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

Attachments: 1. Description of Error Identified in RAI-11 Response – Proprietary
2. Description of Error Identified in RAI-11 Response – Non-Proprietary
3. Affidavit

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 Unit 2

NRC Docket No. 50-277

Description of Error Identified in RAI-11 Response – Non-Proprietary

Description of Error Identified in RAI-11 Response – Non-Proprietary

An error associated with the Peach Bottom Unit 2 replacement steam dryer (RSD) predicted stress ratios provided in response to a request for additional information (RAI-11) was discovered by Westinghouse Electric Company (WEC) during the evaluation of the RSD strain gage data at full EPU conditions.

WEC discovered that a computer software syntax error occurred in the development of the []^{a,c} used to determine the non-main steam line acoustic (NMSLA) stresses. The specific error involved a computer coding error, whereby []^{a,c} were omitted leading to an incorrect reading of data arrays. This occurred when the []^{a,c}

The error resulted in incorrect predicted NMSLA stress ratios, being submitted to the NRC in Reference 1. The Reference 1 submittal supported a revised methodology and provided updated predictions of the minimum alternating stress ratios (MASR) at EPU power level. In Reference 2, the NRC provided approval of the revised methodology and no objections to Exelon's continued power ascension.

The error affected the predicted NMSLA stress results and the resultant MASR but did not affect or change the methodology approved by the NRC. WEC has updated the analysis to correct the error, while retaining all the additional conservatism in the analysis approach. The limiting MASR is reduced from []^{a,c} however, the predicted results remain above the minimum stress ratio (i.e., > 1.0) described in the NRC May 19, 2015, letter.

Peach Bottom Unit 2 has since reached full EPU power and attained actual on-dryer strain gauge data and calculated new stress ratios and new limiting locations per the Unit 2 EPU license conditions using the corrected computer coding. Based on a preliminary assessment, the full EPU power actual stress ratios are greater than, and bound the Reference 1 predicted values.

This issue was entered into both the Exelon and WEC Corrective Action Programs.

References:

3. Exelon Letter to NRC, "Extended Power Uprate: Response to Replacement Steam dryer Request for Additional information," dated May 15, 2015 (ADAMS Accession No. ML15135A402)
4. NRC Letter to Exelon, "Peach Bottom Atomic Power Station, Unit 2 – Approval of Revision to Methodology for establishing Replacement Steam Dryer Strain Limits (TAC No. MF4792)," dated May 19, 2015 (ADAMS Accession No. ML15127A208)

Attachment 3

Peach Bottom Atomic Power Station Unit 2

NRC Docket No. 50-277

AFFIDAVIT

Note

Attachment 1 contains proprietary information as defined by 10 CFR 2.390. WEC, 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. The proprietary information has been faithfully reproduced in the attachment such that the affidavit remains applicable.



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USA

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CAW-15-4243

July 13, 2015

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: LTR-BWR-ENG-15-069 "Impact of MATLAB Script error on the results provided in Westinghouse response to NRC RAI-11"

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-15-4243 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-15-4243, 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.

James A. Gresham, Manager
Regulatory Compliance

July 13, 2015

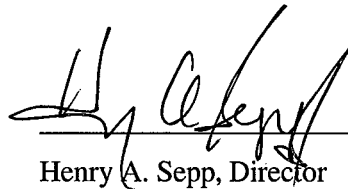
AFFIDAVIT

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 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 "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 LTR-BWR-ENG-15-069, "Impact of MATLAB Script error on the results provided in Westinghouse response to NRC RAI-11" (Proprietary), and for inclusion in Attachment 1 "Description of Error Identified in RAI-11 Response – Proprietary," being transmitted by an 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 RSD analysis for EPU operating conditions for PBAPS Units 2 and 3, and may be used only for that purpose, 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 describing to NRC changes to the RSD analysis for EPU for PBAPS Units 2 and 3 as previously documented in response to NRC RAI-11.
- (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 plant specific replacement steam dryer analysis for licensing basis applications.
 - (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 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 associated with the RSD analysis for EPU operating conditions for PBAPS Units 2 and 3, and may be used only for that purpose, and may be used only for that purpose.

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.