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Serial: NPD-NRC-2015-037
August 5, 2015

10 CFR 52.79

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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

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**LEVY NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 52-029 AND 52-030
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 128 RELATED
TO SRP SECTIONS 6.4, CONTROL ROOM HABITABILITY SYSTEM, FOR THE LEVY
NUCLEAR PLANT, UNITS 1 AND 2, COMBINED LICENSE APPLICATION**

- Reference:
- 1) Letter from Donald Habib (NRC) to Christopher M. Fallon (DEF), dated June 29, 2015, "Request for Additional Information Letter No. 128 Related to Standard Review Plan Section 6.4, Control Room Habitability, for the Levy Nuclear Plant, Units 1 and 2, Combined License Application" (ML15180A275).
 - 2) Letter from Christopher M. Fallon (DEF) to U.S. Nuclear Regulatory Commission (NRC), dated March 26, 2015, "Response to Request for Additional Information Letter No. 122 Related to SRP Section 6.4, Control Room Habitability," Serial: NPD-NRC-2015-003 (ML15089A193)

Ladies and Gentlemen:

Duke Energy Florida, Inc. (DEF) hereby submits our response to the Nuclear Regulatory Commission's (NRC) request for additional information provided in Reference 1. A non-proprietary version of the DEF responses is provided in Enclosure 1 to this letter. Attachments A and B to Enclosure 1 contain the proprietary versions of the responses. No changes to the LNP COLA are required.

Also enclosed is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-15-4233, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice. (Enclosures 2 and 3)

As Attachments A and B to Enclosure 1 contain information proprietary to Westinghouse Electric Company LLC, they are 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 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.

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Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-15-4233 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.

If you have any further questions, or need additional information, please contact Bob Kitchen at (704) 382-4046, or me at (704) 382-9248.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 5, 2015.

Sincerely,



Christopher M. Fallon
Vice President
Nuclear Development

Enclosures/Attachments:

1. LNP Response to NRC RAI Letter No. 128
 - 1A. LNP Response to NRC RAI Question 18-2 (Proprietary)
 - 1B. LNP Response to NRC RAI Question 06.04-6 (Proprietary)
2. Westinghouse Application Letter CAW-15-4233 and Affidavit
3. Proprietary Information Notice and Copyright Notice

cc (w/o enclosures): U.S. NRC Region II, Regional Administrator
cc (w/ enclosures): Mr. Donald Habib, U.S. NRC Project Manager

Levy Nuclear Plant Units 1 and 2 (LNP)
Response to NRC Request for Additional Information Letter No. 128 Related to Standard
Review Plan Sections 6.4, Control Room Habitability System, dated June 29, 2015

NRC RAI #

18-2

Duke Energy RAI #

L-1138

Duke Energy Response

Response enclosed – see following pages

NRC Letter No.: LNP-RAI-LTR-128

NRC Letter Date: June 29, 2015

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 18-2

Text of NRC RAI:

The staff requests additional information for its analysis of main control room heat-up conditions following an accident. The staff used the assumptions in the bullet-points below as the bases for developing the numbered questions that follow. Please confirm whether the assumptions are valid and respond to the below questions; alternatively, explain why an assumption is incorrect or requested information is not necessary,

Assumptions:

- Emergency main control room (MCR) ventilation system (VES) actuates on high-2 alarm for particulate or iodine radioactivity. AC power remains available.
- VBS is not available to perform its normal cooling functions as stated in the March 26, 2015, DEF response to NRC RAI 6.4-4, Enclosure 1, page 3 of 5, paragraph 2 (ADAMS Accession No. ML15089A193).
- Phase 1 load shed occurs upon VES actuation. The plant continues to operate with MCR cooling provided by VES.
- 3 hours after VES actuation, the Phase 2 load shed actuates and the wall panel information system is de-energized.
- Between 1 and 3 hours the main control room temperature would exceed the tech spec limit of 75 degrees F. (DCD, Section 6.4.3.2: "The initial values of temperature/relative humidity in the MCR are 75°F/60 percent. At 3 hours, when the non-1E battery heat loads are exhausted, the conditions are 87.2°F/41 percent.").
- While the MCR temperature surveillance is only required every 24 hours, knowing the temperature profile from the licensing basis operators would take conservative action to monitor MCR temperature and if it exceeds 75 degrees would initiate a shutdown to mode 3 within 6 hours in accordance with the tech spec action statement. The same action would also be taken for the surrounding rooms if their temperature exceeded 85 degrees. (Assumes that there is no ability to restore required air temperatures to within limits within 24 hours) This action would be necessitated by the need to protect the VES heat sink for response to a loss of AC power.

Questions:

1. Is it possible to get a VES actuation via the high-2 radiation signal without experiencing a plant event that would cause a plant trip? Explain why or why not. For example:
 - a. Will the effects of radiation release from a neighboring nuclear unit be sufficient to initiate VES on a high-2 signal?
 - b. Are there shutdown requirements for other site units that are affected by but not causing a radiation release?
 - c. Are there component failures that could inappropriately initiate the high-2 signal?
2. If the answer to #1 is yes, will the unit be shutdown? Explain why or why not.
3. If the answer to #2 is yes, will the shutdown occur prior to the load shed? If not, explain the safety case for performing a plant shutdown without the wall panel information system (WPIS) when AC remains available. (For example, why is it safer to de-energize WPIS than provide modifications that provide MCR cooling from non-safety related sources.)
4. If a shutdown is NOT required,
 - a. Explain the safety case for continued operation without WPIS when AC remains

- available. (For example why is it safer to de-energize WPIS than provide modifications that provide MCR cooling from non-safety related sources.)
- b. As described in DCD, Section 18.8 (page 18.8-1), the WPIS is credited with supporting teamwork, situational awareness, and command and control as part of the "State of the art control room" required by 10 CFR 50.34.f.2.iii. How are these functions accomplished when the WPIS is de-energized?
 - c. VES actuation places the MCR in a condition with reduced lighting, increased noise levels, and restricted access to information used to manage and integrate control room actions. How do these factors affect operator performance? What actions have been taken to validate the proposed licensing basis change is acceptable from an operator performance perspective?
5. List the specific loads that will be de-energized by the phase 1 load shed.
List the specific loads that will be de-energized by the phase 2 load shed

DEF RAI ID#: L-1138

DEF Response to NRC RAI:

The first two NRC assumptions are valid for the deterministic scenarios evaluated herein as Scenario 1a and Scenario 1b. However, they do not represent the operation of the plant for Design Basis Accidents evaluated in FSAR Chapter 15.

NRC assumptions three through five are valid for the uninterrupted sequence of events following VES actuation.

The last NRC assumption represents one possible operator response to Scenarios 1a and 1b. See response to Question 2 below.

1. Yes, two scenarios can be postulated in which VES could actuate from a High-2 signal without an associated plant trip. It is important to first note that the purpose of the High-2 radiation setpoint is to ensure the VES meets requirements of General Design Criteria (GDC) 19, limiting operator dose below 5 rem TEDE for the duration of a postulated accident with design basis LOCA source terms as described in NUREG-1465 and FSAR Section 15.6.

If non-1e ac power is available, the Nuclear Island Nonradioactive Ventilation System (VBS) is designed to maintain personnel doses in the main control room within GDC 19 limits during design basis accidents.

a,c

Because the source term associated with High-2 radiation setpoint levels would only be possible following a postulated accident, normal plant operations are not possible following a non-spurious High-2 signal from an event at the same unit.

There is not a requirement to shutdown a Levy site unit affected by but not causing a radiation release. A decision to shutdown the unaffected unit in this situation would be made by ERO/Control Room personnel on a case by case basis with respect to protection of on-site personnel and the public.

2. Whether or not a shutdown will be required depends on the scenario and assumptions about site conditions. Even without the non-safety Wall Panel Information System

(WPIS), operators still maintain the ability to monitor critical safety functions or manually actuate safety-related systems that achieve critical safety functions.

The responses and information below are based on the completion times of required actions in the proposed/revised Technical Specification 3.7.6 provided in Duke Submittal Letter NPD-NRC-2015-003, dated March 26, 2015.

- a. For Scenario 1a, the following assumptions are made:

a,c

Once VES is actuated, operators will continue to follow Technical Specifications (TS) and operating procedures, including the Abnormal Operating Procedure (AOP) for Loss of Main Control Room Air Conditioning and TS 3.7.6.

The plant will enter TS 3.7.6 Condition F roughly 18 hours after VES actuation, when the air volume in the VES air tanks drops 25% to 245,680 scf. Because Required Action F.1 cannot be accomplished within the required completion time, the plant will enter Condition G only 2 hours after entering Condition F, and must be in Mode 3 roughly 26 hours after VES actuation.

a,c

- b. After VES actuation in Scenario 1b, the plant staff will operate according to operating procedures and Technical Specifications (TS), including the AOP for Loss of Main Control Room Air Conditioning and TS 3.7.6. They would determine whether the signal was generated due to a component failure or spurious PMS actuation, ensure the safeguards function deployed correctly (if due to PMS actuation), and begin taking actions to restore normal VBS operation and return VES to standby readiness. A shutdown to Mode 3 will be only be required if plant staff cannot exit the LCO by completing required actions within associated completion times.

3. In both Scenarios 1a and 1b, a shutdown would not be required before stage 2 load shed occurs, 3 hours after VES actuation. This does not impact the safety case for performing a plant shutdown because the WPIS is non-safety related, and the design basis minimum inventory of

Main Control Room Fixed Displays, Alarms, and Controls described in FSAR Section 18.12.2 is not challenged by the load-shed. Therefore, after the stage 2 load shed, operators are able to monitor critical safety functions, manually actuate safety-related systems that achieve critical safety functions, establish and maintain safe-shutdown conditions, and monitor that the plant remains in a safe state.

Throughout the transient, both the Reactor Operator and Senior Reactor Operator consoles maintain full access to all available instrumentation and controls in the plant via the safety and non-safety workstations.

4. Responses to Question 4:

- a. As described in FSAR Section 6.4 and Section 9.4.1.2, the VBS is located in the auxiliary building, and provides MCR habitability through two redundant, 100 percent capacity equipment trains. As a result, if AC power remains available, it is expected that the non-safety VBS will be available to provide MCR habitability, thus precluding the need for VES actuation and the associated load shed.

a,c

a,c

c. See response to Question 4b.

5. A description of the stage 1 and stage 2 loads is provided in Westinghouse Letter APC_APG_000271 / "Supplemental Response for DEF Response to NRC RAI 122 – Clarification of MCR Load Shed" Duke Submittal Letter, NPD-NRC-2015-028, dated July 1, 2015.

Associated LNP COL Application Revision:

None

Levy Nuclear Plant Units 1 and 2 (LNP)
Response to NRC Request for Additional Information Letter No. 128 Related to Standard
Review Plan Sections 6.4, Control Room Habitability System, dated June 29, 2015

<u>NRC RAI #</u>	<u>Duke Energy RAI #</u>	<u>Duke Energy Response</u>
06.04-6	L-1139	Response enclosed – see following pages

NRC Letter No.: LNP-RAI-LTR-128

NRC Letter Date: Jun 29, 2015

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 06.04-6

Text of NRC RAI:

General Design Criteria (GDC) 19 requires that a design must include a control room from which actions can be taken to operate the nuclear power unit safely under normal conditions and to maintain it in a safe condition under accident conditions, including loss-of-coolant accidents.

Standard Review Plan (SRP) Sections 6.4.1 and 9.4.1 specify that the design is reviewed to ensure that the habitability of the main control room (MCR) area is maintained during adverse environmental occurrences, normal operation, anticipated operational occurrences, and subsequent to postulated accidents. This includes the ability of the design to maintain a suitable ambient temperature for control room personnel and equipment during normal operation, anticipated operational occurrences, and during and after postulated accidents, including the coincidental loss of offsite power.

For this site-specific departure, the AP1000 MCR heat-up GOTHIC analysis was modified to analyze a more limiting operational configuration that resulted in an increase in the maximum temperature in the MCR at 72 hours. The concrete walls, floor and ceiling of the AP1000 MCR provide a passive heat sink to remove the heat loads in the MCR. The AP1000 design includes a steel finned panel attached to the ceiling to enhance its heat-absorbing capacity.

For the staff to review and evaluate the results of the MCR heat-up GOTHIC analysis, address:

- how fouling of the steel finned panel on the MCR ceiling was accounted for in the GOTHIC analysis
- how obstructions (pipes, ducts, trays, acoustic panels, other) located below the steel finned panel were addressed in the GOTHIC analysis
- whether the FSAR will include a commitment to periodically clean or surveil the steel finned panel or whether there is margin between the expected 40 year fouling and the fouling assumed in the analysis.

DEF RAI ID#: L-1139

DEF Response to NRC RAI:

1. How fouling of the steel finned panel on the MCR ceiling was accounted for in the GOTHIC analysis? Is there margin between the expected 40 year fouling and fouling assumed in the analysis?

The equivalent thermal conductivity of the epoxy coating on the steel finned ceiling includes both the thermal resistance of the epoxy paint, as well as an assumed value for the fouling resistance from debris accumulated over plant life. Due to their impact on heat exchanger design, fouling resistances are presented for a wide range of process fluids in the Tubular Exchanger Manufacturers Association (TEMA) Standards.

[

] (a,c)

[

] (a,c)

No surveillance requirement or commitment to periodically clean the steel finned surfaces is required to meet the analysis assumptions.

2. Address the treatment of obstructions below the finned surface

These noted obstructions do not impact flow to/from the finned ceiling or ability of fins to transfer heat. As conservatism, the analysis neglects the heat capacity of steel piping, conduit, and embedments. Additional margin for fin area reduction was included to account for as-built embedments, construction tolerances, and potential for embedments added in the future.

3. Whether the FSAR will include a commitment to periodically clean or surveil the steel finned panel.

The DEF FSAR will not include a commitment for periodically cleaning or surveillance of the steel finned panels. Sufficient margin is conservatively included in the analyzed condition. No surveillance requirement or commitment to periodically clean the steel finned surfaces is required to meet the analysis assumptions.

Associated LNP COL Application Revision:

None

**Westinghouse Application Letter CAW-15-4233 and
Affidavit
(7 pages including cover page)**



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CAW-15-4233

4 August 2015

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Responses to NRC RAIs 128; APP-VES-GF-004 and APP-VES-GF-005

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-15-4233 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 APOG.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-15-4233, 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 "Richard A. DeLong", written over a horizontal line.

Richard A. DeLong, Director
International Licensing & Regulatory Support

CAW-15-4233
4 August 2015

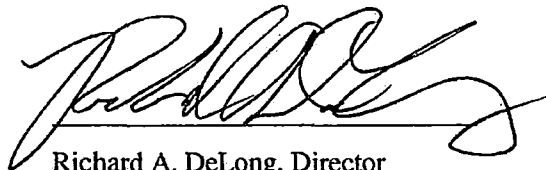
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF BUTLER:

I, Richard A. DeLong, 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 'Richard A. DeLong', is written over a horizontal line.

Richard A. DeLong, Director

International Licensing & Regulatory Support

- (1) I am Director, International Licensing and Regulatory Support, 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 APP-VES-GF-004 and APP-VES-GF-005 for submittal to the Commission, being transmitted by APOG 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 topic of Condensate Return and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to:
 - (i) Provide the NRC and customers with technical information on the additional information on the MCR Habitability Changes.

- (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 more products and services.
 - (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 systems in commercial power reactors 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 and Copyright Notice
(2 pages including cover page)**

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.