

PROPRIETARY INFORMATION – WITHHOLD UNDER 10 CFR 2.390

10 CFR 50.4
10 CFR 2.390

September 4, 2015

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

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

Subject: MELLLA+ License Amendment Request – Supplement 5 Response to
Request for Additional Information

Reference: 1. Exelon letter to the NRC, "License Amendment Request – Maximum
Extended Load Line Limit Analysis Plus," dated September 4, 2014
(ADAMS Accession No. ML14247A503)

2. Exelon letter to the NRC, "MELLLA+ License Amendment Request –
Supplement 4 Response to Request for Additional Information," dated
July 6, 2015 (ADAMS Accession No. ML15187A391)

3. Email from R. Ennis, NRC to K. Borton, Exelon, "MELLLA+ - RSD
Analysis," dated August 4, 2015

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 allow operation in the expanded Maximum Extended Load Line Limit Analysis Plus (MELLLA+) operating domain and the use of the Detect and Suppress – Confirmation Density (DSS-CD) stability solution.

In Peach Bottom MELLLA+ Supplement 4 (Reference 2), the response to EMCB-RAI-3 states that Unit 2 or Unit 3 will not enter into the MELLLA+ region on a unit until that unit's Replacement Steam Dryer (RSD) analysis for EPU combined with MELLLA+ stress ratios have been shown to be greater than 1.0. In an e-mail (Reference 3), the Mechanical and Civil Engineering Branch requested EGC to provide the values for Unit 2 MELLLA+ based on actual EPU data and the Unit 3 MELLLA+ values based on EPU predicted measurements. This letter provides the requested values.

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

Westinghouse Electric Company (WEC) considers portions of the information provided in the Attachment 1 response 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, please call me at (610) 765-5528.

Respectfully,



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

Attachments:

1. Unit 2 and Unit 3 EPU and MELLLA+ Combined RSD MASRs – Proprietary
2. Unit 2 and Unit 3 EPU and MELLLA+ Combined RSD MASRs – 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 and Unit 3

NRC Docket Nos. 50-277 and 50-278

Unit 2 and Unit 3 EPU and MELLLA+ Combined RSD MASRs – **Non-Proprietary**

The following tables summarize the impacts of MELLLA+ on the minimum stress ratios (MASRs) for Peach Bottom Unit 2 and Unit 3 replacement steam dryers (RSDs). Table 1 provides Unit 2 MELLLA+ values based on actual EPU measurements, and Table 2 provides Unit 3 MELLLA+ values based on CLTP measurements extrapolated to EPU conditions using subscale testing. The limiting stress ratios for the RSD remain greater than 1.0.

Table 1: Summary of Unit 2 MASRs

Location	Limiting EPU MASRs	Limiting EPU Combined with MELLLA+ MASRs
[] a,b,c	[] a,b,c	[] a,b,c
[] a,b,c	[] a,b,c	[] a,b,c

Reference: Exelon letter to NRC "Extended Power Uprate: Results of Unit 2 Replacement Steam Dryer Power Ascension Testing" dated August 7, 2015

Table 2: Summary of Predicted Unit 3 MASRs

Location	Limiting EPU MASRs	Limiting EPU Combined with MELLLA+ MASRs
[] a,b,c	[] a,b,c	[] a,b,c
[] a,b,c	[] a,b,c	[] a,b,c

Reference: Exelon letter to NRC "Extended Power Uprate: Unit 3 Replacement Steam Dryer Revised Analysis Report," dated August 20, 2015

Attachment 3

Peach Bottom Atomic Power Station Unit 2 and Unit 3

NRC Docket Nos. 50-277 and 50-278

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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CAW-15-4270

September, 1, 2015

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: "Unit 2 and Unit 3 EPU and MELLLA+ Combined RSD MASRs – Proprietary," Attachment 1 to Exelon Generation Submittal to the NRC "MELLLA+ License Amendment Request – Supplement 5 Response to Request for Additional Information"

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 in the above-referenced report is further identified in Affidavit CAW-15-4270 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-15-4270, 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.

A handwritten signature in black ink, appearing to read 'JA Gresham', written over the printed name.

James A. Gresham, Manager

Regulatory Compliance

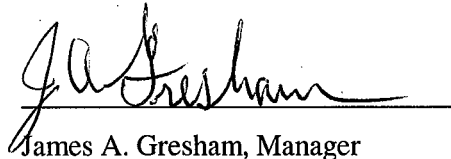
AFFIDAVIT

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 cursive script, appearing to read "JA Gresham", is written over a 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 appropriately marked in "Unit 2 and Unit 3 EPU and MELLLA+ Combined RSD MASRs – Proprietary," Attachment 1 to Exelon Generation Submittal to the NRC "MELLLA+ License Amendment Request – Supplement 5 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 associated with revising the Renewed Operating Licenses for PBAPS Units 2 and 3 to allow operation in the expanded MELLLA+ operating domain and the use of the Detect and Suppress – Confirmation Density (DSS-CD) stability solution, 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 providing replacement steam dryer stress results regarding operation of PBAPS Units 2 and 3 in the MELLLA+ region and the use of the DSS-CD stability solution, as requested by the NRC.
- (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 non-proprietary versions of documents furnished to the NRC associated with revising the Renewed Operating Licenses for PBAPS Units 2 and 3 to allow operation in the expanded MELLLA+ operating domain and the use of the DSS-CD stability solution, 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 that Westinghouse customarily holds in confidence is 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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