



FEB 11 2019

L-2019-013
10 CFR 50.4

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

Re: St. Lucie Plant Unit 1
Docket No. 50-335
Renewed Facility Operating License No. DPR-67
Submittal to NRC Vessels & Internals Integrity Branch of Plant-Specific
Evaluation of the Core Support Barrel Spring 2018 Inspection Results

References:

- (1) FPL Letter L-2011-255, dated July 8, 2011, "Response to NRC Vessels & Internals Integrity Branch Request for Additional Information Regarding Extended Power Uprate License Amendment Request," Accession No. ML11194A016
- (2) Final Safety Evaluation by the Office of Nuclear Reactor Regulation for Topical Report WCAP-17096-NP, Revision 2 "Reactor Internals Acceptance Criteria Methodology and Data Requirements," Accession No. ML16061A243

In Reference 1 above, FPL committed to adopt MRP-227-A with respect to the aging management of the reactor vessel and internals (RVI) components during the period of extended operation. In Reference 2 above, the NRC staff imposed a condition requiring licensees to submit the detailed analysis, replacement schedule, or justification for some other alternative process, within one year of the RVI inspection where degradation is discovered.

Attachment 1 to this letter provides an affidavit requesting that Attachment 2 be withheld from the public as it contains proprietary information.

Attachment 2 provides the disposition for the indications observed on the core shroud and the outside diameter of the St. Lucie Unit 1 core support barrel during the MRP-227-A inspections conducted during the U1 Spring 2018 refueling outage. The indications are being evaluated against an acceptable flaw length permitting a one cycle (18-month) return to service (with margin).

Attachment 2 contains proprietary information. Upon removal, this page is uncontrolled.

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Contact Mr. Michael J. Snyder, St. Lucie Licensing Manager, at (772) 467-7036, if there are any questions about this submittal.

Very truly yours,



Daniel DeBoer
Site Director
St. Lucie Plant

Attachments

cc: St. Lucie NRC Project Manager
St. Lucie NRC Resident Inspector

St. Lucie Unit 1
Docket No. 50-355

L-2019-013
Attachment 1

CAW-18-4834
Application for Withholding proprietary information from Public Disclosure.

Next 7 Pages

Westinghouse Non-Proprietary Class 3



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CAW-18-4834

November 29, 2018

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: LTR-AMLR-18-57 Rev 0 – “Disposition of Indications Observed in the Core Support Barrel at St. Lucie Unit 1”

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 Nuclear Regulatory Commission’s (“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 subject report is further identified in Affidavit CAW-18-4834 signed by the owner of the proprietary information, Westinghouse. 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.

The subject document was prepared and classified as Westinghouse Proprietary Class 2. It contains proprietary information throughout, for the reasons set forth in Sections 4(ii) {a, b, c} of this Affidavit. Accordingly, a redacted version would be of no value to the public and a non-proprietary version will not be issued.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Florida Power & Light Company.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-18-4834, and should be addressed to Camille T. Zozula, Manager, Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 2, Suite 259, Cranberry Township, Pennsylvania 16066.

A handwritten signature in cursive script, reading 'Paul A. Russ'.

Paul A. Russ, Director
Licensing and Regulatory Affairs

Enclosures:

1. Affidavit CAW-18-4834
2. Proprietary Information Notice and Copyright Notice
3. LTR-AMLR-18-57 Rev. 0 – “Disposition of Indications Observed in the Core Support Barrel and Core Shroud at St. Lucie Unit 1”

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF BUTLER:

I, Paul A. Russ, am authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC ("Westinghouse") and declare that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

Executed on: 11/29/18

A handwritten signature in cursive script, appearing to read "Paul A. Russ", written over a horizontal line.

Paul A. Russ, Director
Licensing and Regulatory Affairs

- (1) I am Director, Licensing and Regulatory Affairs, 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 Nuclear Regulatory Commission's ("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, 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-AMLR-18-57 Rev. 0, "Disposition of Indications Observed in the Core Support Barrel and Core Shroud at St. Lucie Unit 1" (Proprietary), for submittal to the Commission, being transmitted by Florida Power & Light Company letter. The proprietary information as submitted by Westinghouse is that associated with St. Lucie Unit 1 Core Barrel Flaw Evaluation, and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to evaluate Reactor Vessel Internals Core Support Barrel flaws.
 - (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 evaluating Reactor Vessel Internals Core Support Barrel flaws.
- (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 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.