

WCAP-17661-P-A / WCAP-17661-NP-A, Revision 1

Project Number 694

Docket #: 99902037

PROJ0694

March 18, 2019

OG-19-40

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

Subject: PWR Owners Group
Transmittal of WCAP-17661-P-A / WCAP-17661-NP-A, Revision 1,
"Improved RAOC and CAOC FQ Surveillance Technical Specifications,"
(PA-LSC-0795 Revision 4)

Reference: NRC letter, "Final Safety Evaluation for Pressurized Water Reactor Owners Group Topical Report WCAP-17661, Rev. 1, "Improved RAOC and CAOC FQ Technical Specifications" (CAC No. MF3348)," dated November 23, 2018

The purpose of this letter is to transmit the NRC Approved version of Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR), WCAP-17661-P-A / WCAP-17661-NP-A, Revision 1, "Improved RAOC and CAOC FQ Surveillance Technical Specifications," that contains the NRC Final Safety Evaluation (FSE) that was transmitted via Reference 1, in accordance with the Nuclear Regulatory Commission (NRC) TR program for review and acceptance for referencing in regulatory actions.

Per NRR Office Instruction LIC-500, Revision 6, "Topical Report Process", Phase 7, the NRC staff will verify the contents of the "-A" version with a final review. Respectfully, the PWROG requests that staff completes this activity within 30 days.

Please note that the following changes were made to the Technical Specification (TS) Bases that were previously transmitted to the NRC in PWROG letter OG-18-188:

The following sentence was deleted from Insert 2 for Action B.2.1 in the Bases for the RAOC TS that are contained in Appendix B of the TR:

"If the RAOC operating spaces specified in the COLR are insufficient to ensure margin to the FQW(Z) limit, then Required Action B.2.1 must be entered and THERMAL POWER must be limited to less than or equal to 50% RTP and AFD limits must be reduced by the amounts specified in the COLR."

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The following sentence was deleted from Insert 3 for Action B.2.1 in the Bases for the CAOC TS that are contained in Appendix E of the TR:

“If the CAOC operating spaces specified in the COLR are insufficient to ensure margin to the FQW(Z) limit, then Required Action B.2.1 must be entered and THERMAL POWER must be limited to less than or equal to 50% RTP and AFD limits must be reduced by the amounts specified in the COLR.”

The sentence was deleted because it would require reducing thermal power to less than or equal to 50% RTP any time that Required Action B.2.1 is entered, which is not correct. The next paragraph in each of the TS Bases Inserts is the appropriate location in the Bases to discuss the ultimate 50% RTP limit, and is correct as written.

Additionally, the words “and AFD” were deleted from Insert 3 for Action B.2.1 in the Bases for the CAOC TS that are contained in Appendix E of the TR, because only thermal power is required to be reduced if the FQ LCO is not met. Only the RAOC TS requires both thermal power and AFD to be reduced.

These changes to the TS Bases do not impact the FSE for the TR that was transmitted in Reference 1.

Appendix H contains editorial changes to the FSE.

These editorial changes do not impact the FSE for the TR that was transmitted in Reference 1.

Enclosed are:

1. WCAP-17661-P-A, Revision 1, “Improved RAOC and CAOC FQ Surveillance Technical Specifications”
2. WCAP-17661-NP-A, Revision 1, “Improved RAOC and CAOC FQ Surveillance Technical Specifications”

Enclosure 3 contains Westinghouse authorization letter CAW-19-4867, the accompanying affidavit, Proprietary Information Notice, and Copyright Notice.

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 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 CAW-19-4867 and should be addressed to Nancy B. Closky, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Correspondence related to this transmittal should be addressed to:

Mr. W. Anthony Nowinowski, Program Manager
PWR Owners Group, Program Management Office
Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, PA 16066

If you have any questions, please do not hesitate to contact me at (805) 788-8417 or Mr. W. Anthony Nowinowski, Program Manager of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely yours,



Ken Schrader, Chief Operating Officer and Chairman
PWR Owners Group

CMH:KS:am

- Enclosure 1. One copy of WCAP-17661-P-A, Revision 1, "Improved RAOC and CAOC FQ Surveillance Technical Specifications"
- Enclosure 2. One copy of WCAP-17661-NP-A, Revision 1, "Improved RAOC and CAOC FQ Surveillance Technical Specifications"
- Enclosure 3: One copy of the Application for Withholding, CAW-19-4867 (Non-proprietary) with the accompanying affidavit, Proprietary Information Notice and Copyright Notice

cc: PWROG Management Committee
PWROG Licensing Subcommittee
PWROG Steering Committee
PWROG PMO
J. Andrachek, Westinghouse
J. Moorehead, Westinghouse
M. Hone, Westinghouse
J. Drake, US NRC

Westinghouse Non-Proprietary Class 3



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CAW-19-4867

March 12, 2019

**APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE**

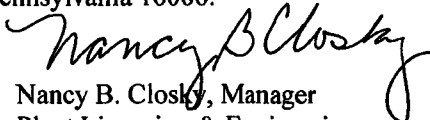
Subject: Submittal of WCAP-17661-P/NP-A, Revision 1, "Improved RAOC and CAOC FQ Surveillance Technical Specifications"

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-19-4867 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.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by the Pressurized Water Reactor Owners Group (PWROG).

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-19-4867, and should be addressed to Nancy B. Closky, Manager, Plant Licensing & Engineering, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3, Suite 330E, Cranberry Township, Pennsylvania 16066.


Nancy B. Closky, Manager
Plant Licensing & Engineering

Enclosures:

1. Affidavit CAW-19-4867
2. Proprietary Information- Notice and Copyright Notice
3. WCAP-17661-P-A, Revision 1, "Improved RAOC and CAOC FQ Surveillance Technical Specifications"
4. WCAP-17661-NP-A, Revision 1, "Improved RAOC and CAOC FQ Surveillance Technical Specifications"

AFFIDAVIT

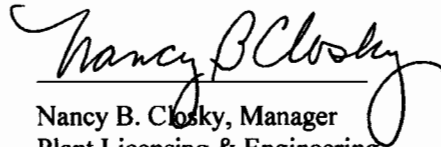
COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

I, Nancy B Closky, 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: March 12, 2019


Nancy B. Closky, Manager
Plant Licensing & Engineering

- (1) I am Manager, Plant Licensing & 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 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 WCAP-17661-P-A, Revision 1, "Improved RAOC and CAOC F_Q Surveillance Technical Specifications" (Proprietary), for submittal to the Commission, being transmitted by PWROG letter OG-19-40. The proprietary information as submitted by Westinghouse is that associated with NRC approval of WCAP-17661, and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to develop and improved F_Q Technical Specification (TS) that addresses issues associated with the current TS. Specifically, the new TS will minimize, to the extent possible, the sensitivity of the surveillance to differences between measured and predicted axial offset.

- (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 improving the FQ Technical Specification.
 - (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.