



AUG 19 2019

L-2019-130
10 CFR 50.4

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

RE: St. Lucie Nuclear Plant, Unit 1
Docket No. 50-335
Renewed Facility Operating Licenses NPF-16

St. Lucie Unit 1 Revised Plant-Specific Evaluation of the Core Support Barrel Spring 2018
Inspection Results

References:

1. FPL Letter L-2019-013, Submittal to NRC Vessels & Internals Integrity Branch of Plant-Specific Evaluation of the Core Support Barrel Spring 2018 Inspection Results, February 11, 2019 (ADAMS Accession No. ML19044A636)
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," (ADAMS Accession No. ML16061A243)
3. Westinghouse Report, WCAP-17684-P, Rev. 2, "Generic Flaw Acceptance Criteria for Combustion Engineering and Westinghouse MRP-227-A Core Barrel and Core Shroud Welds," May 2019.

In Reference 1, Florida Power & Light Company (FPL) submitted an evaluation detailing the results of the reactor vessel internals (RVI) component inspection conducted at the St. Lucie Nuclear Plant, Unit 1 (St. Lucie Unit 1) during the spring 2018 refueling outage. The evaluation included disposition of indications observed on the St. Lucie Unit 1 reactor core support barrel and core shroud, and justification with margin using the methodology in Reference 2 for continuing operation for one refueling cycle (18-months).

Subsequent to the Reference 1 submittal, FPL was notified of a calculation error in the generic flaw size evaluation (Reference 3), which is a supporting document in Reference 1. The calculation has since been corrected and a revised RVI evaluation is hereby submitted as Revision 1 to the evaluation provided in Reference 1. FPL has determined that the corrected calculation does not change the conclusion in Reference 1 that the observed core barrel and core shroud indications remain satisfactory for continuing operation for one refueling cycle (18 months).

Attachment 1 contains an affidavit and the proprietary information and copyright notices supporting the withholding of Attachment 2 from public disclosure pursuant to 10 CFR 2.390(a)(4). Attachment 2 provides the corrected disposition for the indications observed on the core support barrel and core shroud. Attachment 2 contains information proprietary to Westinghouse Electric Company LLC "Westinghouse", which is supported by the affidavit contained in Attachment 1 and 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 Nuclear Regulatory Commission ("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 CA W-19-4904 and should be addressed to Camille T. Zozula, Manager,

Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 165, Cranberry Township, Pennsylvania 16066.

This letter contains no new regulatory commitments.

Should you have any questions regarding this submittal, please contact Ms. Katarzyna Paez, St. Lucie Licensing, at (772) 467-7504.

Sincerely,



Daniel D. DeBoer
Daniel D. DeBoer
Site Director, St. Lucie Nuclear Plant
Florida Power & Light

Attachments

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, St. Lucie Nuclear Plant, Units 1 and 2
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant, Units 1 and 2

St. Lucie Nuclear Plant, Unit 1
Docket No. 50-335

L-2019-130
Attachment 1

Westinghouse Affidavit CAW 19-4904

Proprietary Information Notice and Copyright Notice

(4 pages follow)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Nancy B. Closky, have been specifically delegated and authorized to apply for withholding and execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse).
- (2) I am requesting the proprietary portions of LTR-AMLR-18-57 Rev. 1 be withheld from public disclosure under 10 CFR 2.390.
- (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 10 CFR 2.390, 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 and is not customarily disclosed to the public.
 - (ii) 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.

AFFIDAVIT

- (5) Westinghouse has policies in place to identify proprietary information. 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.
- (6) The attached submittal contains proprietary information throughout, for the reasons set forth in Sections 5 (a), (b), and (c) of this Affidavit. Accordingly, a redacted version would be of no value to the public.

AFFIDAVIT

I declare that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

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

Executed on: June 24, 2019

Nancy B. Closky
Nancy B. Closky, Manager
Plant Licensing and Engineering

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.