

WCAP-17451-P, Revision 2
Project Number 99902037

September 13, 2019

OG-19-197

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: PWR Owners Group
Submittal of WCAP-17451-P, Revision 2, "Reactor Internals Guide Tube Wear - Westinghouse Domestic Fleet - Operational Projections" to the NRC for Information Only (PA-MS-C-1471)

References: Response to NRC Request for List of PWR Owners Group Planned Topical Report Submittals for 2019, dated February 22, 2019, OG-19-44

The purpose of this letter is to submit Pressurized Water Reactor Owners Group (PWROG) Topical Report, WCAP-17451-P, Revision 2, "Reactor Internals Guide Tube Wear - Westinghouse Domestic Fleet - Operational Projections" for information only (Enclosure 1). The submittal plans were communicated to the NRC through Reference 1. The report is not being submitted for NRC review and approval pursuant to the provisions of 10 CFR 170.11(a)(1)(iii)(A) and a separate TAC number should not be opened associated with the WCAP-17451-P, Revision 2.

The revised report is being provided for information to support the staff's review of MRP-227, Rev. 1 and WCAP-17096, Rev. 3. The subject document was prepared and classified as Westinghouse Proprietary Class 2. Westinghouse requests that the document be considered proprietary in its entirety. As such, a non-proprietary version will not be issued.

Also enclosed (Enclosure 2) are the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-19-4941, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice. 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.

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NRR

Correspondence with respect to the copyright or proprietary aspects of the item listed above or the supporting Westinghouse Affidavit should reference CAW-19-4941 and should be addressed to Camille T. Zozula, Manager, Infrastructure and Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 1, Suite 165, 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, Suite 172
Cranberry Township, Pennsylvania 16066

If you have any questions, please do not hesitate to contact me at (805) 545-4328 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

KS:WAN:am

Enclosure 1: One copy of WCAP-17451-P, Revision 2 (for information only) (Proprietary)

Enclosure 2: One copy of the Application for Withholding, CAW-19-4941 (Non-proprietary) with the accompanying affidavit, Proprietary Information Notice and Copyright Notice.

cc: PWROG Management Committee Representatives
PWROG Materials Committee Members
PWROG PMO
I. Ezzi, W
B. Wilson, W
M. Tronosky, W
D. Holderbaum, W
K. Amberge, EPRI
B. Burgos, EPRI
R. Dyle, EPRI

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Camille T. Zozula, 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 WCAP-17451-P 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

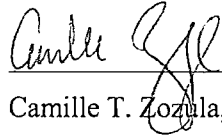
- (5) Westinghouse has policies in place to identify proprietary information. Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:
- (a) The information 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) through (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: 09 Sept 2019



Camille T. Zozula, Manager
Infrastructure & Facilities Licensing

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.