



Program Management Office
1000 Westinghouse Drive, Suite 172
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Project Number 99902037

November 20, 2019

OG-19-243 Rev. 1

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

Subject: PWR Owners Group
PWROG Comments on the Draft Safety Evaluation for PWROG-17034-P/NP, "Evaluation of the WCAP-10325-P-A Westinghouse LOCA Mass & Energy Release Methodology" (PA-ASC-1420)

References:

1. Draft Safety Evaluation by the Office of Nuclear Reactor Regulation Topical Report PWROG-17034, Revision 0, "Evaluation of the WCAP-10325-P-A Westinghouse LOCA Mass & Energy Release Methodology" (EPID: L-2018-TOP-0013)

By letter dated March 29, 2018 Agencywide Documents Access and Management System (ADAMS) Accession No. ML18114A184), the Pressurized Water Reactor Owner's Group (PWROG) submitted Topical Report (TR) PWROG-17034-P Revision 0, "Evaluation of the WCAP-10325-P-A Westinghouse LOCA [Loss-of-Coolant Accident] Mass & Energy [M&E] Release Methodology," for review and approval. The TR was supplemented by a letter dated July 9, 2018 (ADAMS Accession No. ML18193A455) which provided changes to pages 2-2 and 2-3 of the TR, and also supplemented by a letter dated July 17, 2019 (ADAMS Accession Nos. ML19203A154 and ML19203A155) which provided responses to the NRC staff requests for additional information (RAIs), to the U.S. Nuclear Regulatory Commission (NRC).

The NRC staff transmitted its draft safety evaluation (DSE) via a letter dated September 26, 2019. (EPID: L-2018-TOP-0013).

Enclosure 1 contains the PWROG comments on the DSE and identifies the specific changes to the DSE to address those comments. Enclosure 2 contains the Proprietary markup of the DSE to reflect the changes identified. Enclosure 3 contains a Non-Proprietary version of the PWROG comments on the DSE and Enclosure 4 contains the Non-Proprietary markup of the DSE to reflect the changes identified.

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The PWROG requests that the NRC provide a copy of the DSE comment resolution form for PWROG review prior to issuing the Final Safety Evaluation (FSE).

Enclosure 5 is Westinghouse letter CAW-19-4974 the accompanying affidavit, Proprietary Information Notice, and Copyright Notice.

The enclosed material (Enclosures 1 and 2) contains information proprietary to Westinghouse Electric Company LLC ("Westinghouse"), 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 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 this 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 item listed above or the supporting Westinghouse Affidavit should reference CAW-19-4974 and should be addressed to Camille T. Zozula, Manager, Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, 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, PA 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, COO & Chairman
PWR Owners Group

KJS:am

cc: PWROG Analysis Committee
PWROG Steering and Management Committee
PWROG PMO
K. W. Bonadio, Westinghouse
J. D. Andrachek, Westinghouse
R. M. Jakub, Westinghouse
P. R. Stevenson, Westinghouse
J. Drake, US NRC
L. Fields, US NRC

- Enclosure 1: Proprietary Comments on the Draft SE for PWROG-17034-P (Westinghouse Proprietary Class 2)
- Enclosure 2: Proprietary Markups of the Draft SE for PWROG-17034-NP (Westinghouse Proprietary Class 2)
- Enclosure 3: Non-Proprietary Comments on the Draft SE for PWROG-17034-NP (Westinghouse Non-Proprietary Class 3)
- Enclosure 4: Non-Proprietary Markups of the Draft SE for PWROG-17034-NP (Westinghouse Non-Proprietary Class 3)
- Enclosure 5: Affidavit for Withholding, CAW-19-4974 with accompanying Affidavit, Proprietary Information Notice and Copyright Notice (Westinghouse Non-Proprietary Class 3)

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 OG-19-243 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.

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- (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 documents are bracketed and marked to indicate the bases for withholding. The justification for withholding 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


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refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this 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: 20 Nov 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.