



Program Management Office
1000 Westinghouse Drive, Suite 172
Cranberry Township, PA 16066

PWROG-16043-P/NP-A, Revision 2
Docket #: 99902037

December 12, 2019

OG-19-251

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

Subject: PWR Owners Group
Transmittal of PWROG-16043-P/NP-A, Revision 2, "PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs" (PA-ASC-1169)

Reference: NRC letter, "Final Safety Evaluation for Pressurized Water Reactor Owners Group Topical Report PWROG-16043-P, Revision 2, PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs" (EPID: L-2018-TOP-0021), dated October 31, 2019

The purpose of this letter is to transmit the NRC Approved version of Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR), PWROG-16043-P, Revision 2, "PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs" 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.

Enclosed are:

1. PWROG-16043-P-A, Revision 2, "PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs" (Westinghouse Proprietary)
2. PWROG-16043-NP-A, Revision 2, "PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs" (Westinghouse Non-Proprietary)

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Enclosure 3 contains Westinghouse authorization letter CAW-19-4978, the accompanying affidavit, Proprietary Information Notice, and Copyright Notice.

Enclosure 1 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 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-19-4978 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
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 PWROG-16043-P-A, Revision 2, "PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs"; (Westinghouse Proprietary)
- Enclosure 2. One copy of PWROG-16043-NP-A, Revision 2, "PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs" (Westinghouse Non-proprietary)
- Enclosure 3: One copy of the Application for Withholding, CAW-19-4978 (Westinghouse 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. Sinegar, Westinghouse
L. Fields, US NRC

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-19-25 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

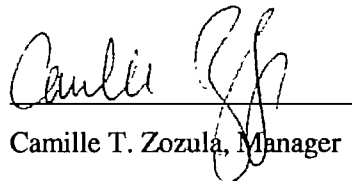
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refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this Affidavit.

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: 11 Dec 2019



Camille T. Zozula, Manager
Infrastructure & Facilities Licensing