

PROPRIETARY INFORMATION – WITHHOLD FROM PUBLIC DISCLOSURE IN
ACCORDANCE WITH 10 CFR 2.390



Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213
Tel 601-368-5138

Ron Gaston
Director, Nuclear Licensing

10 CFR 50.90

2CAN032001

March 11, 2020

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Response to Request for Additional Information Related to License Amendment
Request to Revise the Control Element Assembly Drop Times

Arkansas Nuclear One, Unit 2
NRC Docket No. 50-368
Renewed Facility Operating License No. NPF-6

By letter dated December 18, 2019 (Reference 1), Entergy Operations, Inc. (Entergy), requested NRC approval of a proposed change to the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TSs) that would increase the existing individual and average Control Element Assembly (CEA) drop times established in TS 3.1.3.4, "CEA Drop Time," by 0.2 seconds. During the course of review, the NRC determined additional information was required to complete the review process.

The NRC issued a request for additional information (RAI) on February 24, 2020 (Reference 2) providing a 30-day response period (i.e., response due March 25, 2020). Entergy's RAI response is included in the attached enclosure. The responses do not impact the no significant hazards consideration provided in the original amendment request (Reference 1).

Enclosure 1 contains information considered proprietary to Westinghouse Electric Company LLC (Westinghouse) and is supported by an Affidavit (Enclosure 3) 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 NRC and addresses with specificity the considerations listed in Paragraph (b)(4) of Section 2.390 of the NRC'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 2.390 of the NRC's regulations. Note that Enclosure 1 is derived from Westinghouse report LTR-TA-20-42-P. Enclosure 2 contains a non-proprietary version of Enclosure 1.

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This cover letter may be released for public disclosure following removal of Enclosure 1 from this correspondence.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-20-5011 and should be addressed to Camille T. Zozula, Manager, Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 165, Cranberry Township, Pennsylvania 16066.

No new regulatory commitments are included in this submittal.

In accordance with 10 CFR 50.91, Entergy is notifying the State of Arkansas of Entergy's RAI response by transmitting a copy of this letter and enclosure to the designated State Official.

If there are any questions or if additional information is needed, please contact Riley Keele, Manager, Regulatory Assurance, Arkansas Nuclear One, at 479-858-7826.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on March 11, 2020.

Respectfully,

ORIGINAL SIGNED BY RON GASTON

Ron Gaston

RWG/dbb

- Enclosure 1: Response to Request for Additional Information Related to Proposed Increase in Control Element Assembly Drop Times (PROPRIETARY)
- Enclosure 2: Response to Request for Additional Information Related to Proposed Increase in Control Element Assembly Drop Times (NON-PROPRIETARY)
- Enclosure 3: Affidavit – Basis for Information to be Withheld from Public Disclosure

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- References:
1. Entergy Operations, Inc. (Entergy) letter to U. S. Nuclear Regulatory Commission (NRC), *License Amendment Request to Revise Control Element Assembly Drop Time*, Arkansas Nuclear One, Unit 2 (2CAN121903) (ML19352F266), dated December 18, 2019.
 2. NRC email to Entergy, *ANO-2 Final RAI RE: License Amendment Request to Revise Control Element Assembly Drop Time (EPID L-2019-LLA-0285)*, (2CNA022002) (ML20055E909), dated February 24, 2020.

cc: NRC Region IV Regional Administrator
NRC Senior Resident Inspector – Arkansas Nuclear One
NRC Project Manager – Arkansas Nuclear One
Designated Arkansas State Official

**PROPRIETARY INFORMATION – WITHHOLD FROM PUBLIC DISCLOSURE IN
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Enclosure 3

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**Affidavit – Basis for Information to be Withheld from Public Disclosure
(3 pages)**

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 LTR-TA-20-42-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 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

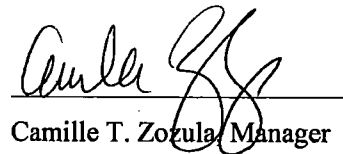
AFFIDAVIT

lower case letters 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: 10 March 2020


Camille T. Zozula, Manager

Infrastructure & Facilities Licensing