



Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, PA 16066
USA

ATTN: Document Control Desk
Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Direct tel: 1-412-374-2577
Direct fax:
e-mail: zozulact@westinghouse.com

Your ref: USA/9297/AF-96
Our ref: LTR-LCPT-20-10

April 24, 2020

Subject: Submittal of LTR-LCPT-20-09, "Amendment Request Application USA/9297/AF-96 for Model No. Traveller STD, XL, and VVER Packages"

Enclosed are the three proprietary attachments for LTR-LCPT-20-09, "Supplement Submittal for Amendment Request Application USA/9297/AF-96 for Model No. Traveller STD, XL, and VVER Packages". Enclosures are submitted as proprietary in their entirety. A non-proprietary, redacted version would be of no value to the public.

This submittal contains proprietary information of Westinghouse Electric Company LLC ("Westinghouse"). In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Nuclear Regulatory Commission's ("Commission's") regulations, we are enclosing with this submittal an Affidavit. The Affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission.

Correspondence with respect to the proprietary aspects of the submittal or the Westinghouse Affidavit should reference AW-20-5041 and should be addressed to Camille T. Zozula, Manager Regulatory Compliance & Corporate Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Cranberry Township, PA 16066.

A handwritten signature in cursive script that reads "Camille T. Zozula".

Camille T. Zozula, Manager
Regulatory Compliance & Corporate Licensing
Westinghouse Electric Company, LLC

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-LCPT-20-09 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: 24 April 2020



Camille T. Zozula, Manager

Regulatory Compliance & Corporate Licensing