



April 30, 2020

L-2020-066
10 CFR 50.4

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D C 20555-0001

RE: St. Lucie Nuclear Plant, Unit 1
Docket No. 50-335
Renewed Facility Operating Licenses NPF-16

WCAP-18452-P, Revision 1, St. Lucie Unit 1 Core Support Barrel and Core Shroud Flaw Analysis

References:

1. FPL Letter L-2019-013, Submittal to NRC Vessels & Internals Integrity Branch of Plant-Specific Evaluation of the Core Support Barrel Spring 2018 Inspection Results, February 11, 2019 (ADAMS Accession No. ML19044A636)
2. FPL Letter L-2019-130, "St. Lucie Unit 1 Revised Plant-Specific Evaluation of the Core Support Barrel Spring 2018 Inspection Results", August 19, 2019 (ADAMS Accession No. ML19232A095)

In Reference 1, Florida Power & Light Company (FPL) submitted an evaluation detailing the results of the reactor vessel internals (RVI) component inspection conducted at the St. Lucie Nuclear Plant, Unit 1 (St. Lucie Unit 1) during the spring 2018 refueling outage. The evaluation included disposition of indications observed on the St. Lucie Unit 1 reactor core support barrel and core shroud, and justification with margin for continuing operation for one refueling cycle (18-months). In Reference 2, FPL submitted a revision to the RVI evaluation provided in Reference 1.

The enclosure to this letter provides WCAP-18452-P, Revision 1, "St. Lucie Unit 1 Core Support Barrel and Core Shroud Flaw Analysis" and affidavit for public withholding. WCAP-18452-P, Revision 1, provides the results and evaluation of the follow-up RVI component inspection conducted at St. Lucie Unit 1 during the fall 2019 refueling outage. The results of the recent inspection did not identify evidence of flaw growth, and support a longer inspection interval, up to 10 years from the spring 2018 refueling outage.

Attachment 1 to the enclosure contains an affidavit and the proprietary information and copyright notices supporting the withholding of Attachment 2 from public disclosure pursuant to 10 CFR 2.390(a)(4). Attachment 2 provides WCAP-18452-P, Revision 1. Attachment 2 **contains information proprietary to Westinghouse Electric Company LLC "Westinghouse", which is supported by the affidavit contained in Attachment 1 and 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-20-5029 and should be addressed to Camille T. Zozula, Manager, Regulatory Compliance & Corporate Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 165, Cranberry Township, Pennsylvania 16066.**

This letter contains no new regulatory commitments.

Florida Power & Light Company

6501 S. Ocean Drive, Jensen Beach, FL 34957

Should you have any questions regarding this submittal, please contact Mr. Wyatt Godes, St. Lucie Licensing, at (772) 467-7435.

Sincerely,



Daniel D. DeBoer
Site Director, St. Lucie Nuclear Plant
Florida Power & Light

Attachments

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, St. Lucie Nuclear Plant, Units 1 and 2
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant, Units 1 and 2

St. Lucie Nuclear Plant, Unit 1
Docket No. 50-335

L-2020-066
Attachment 1

Westinghouse Affidavit CAW-20-5029
Proprietary Information Notice and Copyright Notice
(3 pages follow)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Korey L. Hosack, 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-18452-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), (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: 2020 04 03



Korey L. Hosack, Manager
Licensing, Analysis, & Testing