

December 26, 2000  
RC-00-0375



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

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
SUBMITTAL OF WCAP 15615, REV 0,  
INTEGRITY EVALUATION FOR FUTURE OPERATION  
VIRGIL C. SUMMER NUCLEAR PLANT:  
REACTOR VESSEL NOZZLE TO PIPE WELD REGIONS

Stephen A. Byrne  
Vice President  
Nuclear Operations  
803.345.4622

- Attachments:
1. D. Alexander (Westinghouse) Letter to R.Clary, CGE-00-125, December 22, 2000
  2. Deleted
  3. Westinghouse Proprietary Information Notice
  4. Westinghouse Copyright Notice
  5. S. Rupprecht (Westinghouse) Letter to Document Control Desk, CAW-00-1432, December 22, 2000
  6. Westinghouse WCAP-15615, Revision 1, (Proprietary) and WCAP-15617, Revision 0, (Non-Proprietary), "Integrity Evaluation for Future Operation Virgil C. Summer Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions".

This letter provides Revision 1 of WCAP-15615, proprietary Class 2C, and Revision 0 of WCAP-15617, proprietary Class 3 (Att. 6), which were provided to South Carolina Electric & Gas Company (SCE&G) by Westinghouse (Att. 1). These documents provide the basis for reactor coolant system integrity and support the safe startup and continued operation of the Virgil C. Summer Nuclear Station, Unit 1. The revisions are represented as consistent with 10CFR2.790.

Also attached are the Westinghouse authorization letter CAW-00-1432 (which includes the accompanying affidavit), the Proprietary Information Notice, and the Copyright Notice (Att. 3 - 5).

As WCAP-15615 contains information proprietary to Westinghouse Electric Corporation, it is accompanied 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 Commission and addresses with

AP01

**NUCLEAR EXCELLENCE – A SUMMER TRADITION!**

South Carolina Electric & Gas Co.  
Virgil C. Summer Nuclear Station  
P. O. Box 88  
Jenkinsville, South Carolina  
29065

803.345.5209  
803.635.1461

Document Control Desk  
Attachment 1  
MSP 00-0244  
RC-00-0375  
Page 1 of 1

specificity the considerations listed in paragraph (b)(4) of Section 2.790 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 2.790 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-00-1432 and should be addressed to Mr. H. A. Sepp, Manager, Regulatory and Licensing Engineering, Westinghouse Electric Corporation, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Should you have any questions, please call Mr. Philip Rose at (803) 345-4052 at your convenience.

Very truly yours,



Stephen A. Byrne

PAR/SAB/dr  
Attachments (5)

NOTE: Without Attachment unless noted below.  
Attachments are on file in the NL&OE office.

c: N. O. Lorick  
N. S. Carns  
T. G. Eppink  
R. J. White  
L. A. Reyes (with Attachment)  
K. R. Cotton (with Attachment)  
NRC Resident Inspector (with Attachment)

J. B. Knotts, Jr.  
NSRC  
RTS (MSP 00-0244)  
File (810.58)  
DMS (RC-00-0375)

Document Control Desk  
Attachment 1  
MSP 00-0244  
RC-00-0375  
Page 1 of 1

D. Alexander (Westinghouse) Letter to R. Clary (SCE&G)

CGE-00-0125

December 22, 2000



Westinghouse Electric Company, LLC

Box 355  
Pittsburgh Pennsylvania 15230-0355

December 22, 2000

CGE-00-125  
CAW-00-1432  
P.O. SR710576  
S.O. 6516

Mr. Gary Moffatt, Engineering Manager  
South Carolina Electric and Gas Company  
Virgil C. Summer Nuclear Station  
P.O. Box 88, Mail Code 830  
Jenkinsville, SC 29065

Attention: Mr. Ron Clary

Subject: SOUTH CAROLINA ELECTRIC AND GAS COMPANY  
VIRGIL C. SUMMER NUCLEAR PLANT  
**WCAP-15615, Rev. 1, Integrity Evaluation for Future Operation Virgil C. Summer  
Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions (Proprietary)**  
**WCAP-15617, Rev. 0, Integrity Evaluation for Future Operation Virgil C. Summer  
Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions (Non-proprietary)**

Dear Mr. Clary:

This letter transmits four copies of proprietary and non-proprietary versions of "Integrity Evaluation for Future Operation Virgil C. Summer Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions" dated December, 2000 to be included in your submittal to the NRC for review and approval.

In addition to the proprietary and non-proprietary versions of the information, there are four other documents for use in your NRC submittal:

1. Information which should be included in your transmittal letter
2. A Proprietary Information Notice to be attached to your NRC transmittal letter
3. A Copyright Notice to be attached to your NRC transmittal letter
4. A Westinghouse letter, "Application for Withholding Proprietary Information from Public Disclosure" (CAW-00-1432) with Affidavit CAW-00-1432.

Please transmit the original of Item 4 to the NRC in your transmittal.

If you have any questions please contact me on 412-374-5651 or Don Seeger at 412-374-3784.

Sincerely,

Dwain W. Alexander  
Customer Projects Manager

CGE-00-125  
CAW-00-1432  
P. O. SR710576  
S. O. 6516

December 22, 2000

cc: M. Brown (SCE&G)  
G. Williams (SCE&G)  
R. Clary (SCE&G)  
P. Harden (W) Charlotte  
D. Seeger - EC 310

Westinghouse Proprietary Class 2

South Carolina Electric and Gas Company

LETTER FOR TRANSMITTAL TO THE NRC

The following paragraphs should be included in your letter to the NRC.

Enclosed are:

1. Four copies of WCAP-15615, Rev. 1, "Integrity Evaluation for Future Operation Virgil C. Summer Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions", (Proprietary).
2. Four copies of WCAP-15617, "Integrity Evaluation for Future Operation Virgil C. Summer Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions", (Non-Proprietary).

Also enclosed are a Westinghouse proprietary authorization letter CAW-00-1432 and the accompanying affidavit, a Proprietary Information Notice and a Copyright Notice.

As Item 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 Commission and addresses with specificity the consideration listed in paragraph (b)(4) of Section 2.790 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-00-1432 and should be addressed to H. A. Sepp, Manager of Regulatory and Licensing Engineering, Westinghouse Electric Company, LLC ("Westinghouse"), P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Document Control Desk  
Attachment 3  
MSP 00-0244  
RC-00-0375  
Page 1 of 1

Westinghouse

Proprietary Information Notice

## PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents 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 2.790 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) contained within parentheses 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 2.790(b)(1).



Document Control Desk  
Attachment 4  
MSP 00-0244  
RC-00-0xxx  
Page 1 of 1

Westinghouse

Copyright Notice

## 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 2.790 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.

Document Control Desk  
Attachment 5  
MSP 00-0244  
RC-00-0375  
Page 1 of 1

S. Rupprecht (Westinghouse) Letter to Document Control Desk

CAW-00-1432

December 22, 2000



Westinghouse Electric Company, LLC

Box 355  
Pittsburgh Pennsylvania 15230-0355

December 22, 2000

CAW-00-1432

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

Attention: Mr. Samuel J. Collins

APPLICATION FOR WITHHOLDING PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE

Subject: South Carolina Electric and Gas Company - Virgil C. Summer Nuclear Plant  
WCAP-15615, Rev. 1, Integrity Evaluation for Future Operation Virgil C. Summer  
Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions (Proprietary)  
WCAP-15617, Rev. 0, Integrity Evaluation for Future Operation Virgil C. Summer  
Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions (Non-proprietary)

Dear Mr. Collins:

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-00-1432 signed by the owner of the proprietary information, Westinghouse Electric Company, LLC. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.790 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by South Carolina Electric and Gas Company.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-00-1432 and should be addressed to the undersigned.

Very truly yours,

Sadler Rupprecht, Vice President  
Engineering Services

Enclosures

cc: S. Bloom/NRR/OWFN/DRPW/PDIV2 (Rockville, MD) 1L

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

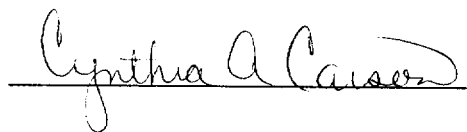
COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Sadler Rupprecht, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC ("Westinghouse"), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:

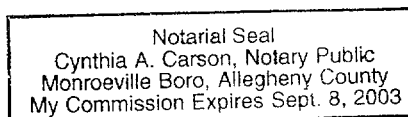


Sadler Rupprecht, Vice President  
Engineering Services

Sworn to and subscribed  
before me this 22 day  
of December, 2000



Notary Public



- (1) I am Vice President, Engineering Services in the Nuclear Services Business Unit of the Westinghouse Electric Company LLC ("Westinghouse"), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Electric Company, LLC.
- (2) I am making this Affidavit in conformance with the provisions of 10CFR Section 2.790 of the Commission's regulations and in conjunction with the Westinghouse Application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by the Westinghouse Electric Company LLC in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.790 of the Commission's regulations, 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
  - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

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.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
- (b) It is information which is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.

- (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.
  - (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
  - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
  - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10CFR Section 2.790, it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WCAP-15615, Rev. 1, "Integrity Evaluation for Future Operation Virgil C. Summer Nuclear Plant: Reactor Vessel Nozzle to Pipe Weld Regions" (Proprietary) for the V. C. Summer Nuclear Plant being transmitted by the South Carolina Electric and Gas Company letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk, Attention: Mr. Samuel J. Collins. The proprietary information as submitted for use by South Carolina Electric and Gas Company for the V. C. Summer Nuclear Plant is expected to be applicable in other licensee submittals.



This information is part of that which will enable Westinghouse to:

- (a) Complete a flaw evaluation to establish that applicable codes and standards are met with potential cracking susceptibility of the reactor vessel nozzle to pipe weld regions at the V. C. Summer Nuclear Plant.
- (b) Assess the impact of the potential cracking susceptibility of the reactor vessel nozzle to pipe weld regions at the V. C. Summer Nuclear Plant on the continued applicability of the leak-before-break concept.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purposes of meeting NRC requirements for licensing documentation.
- (b) Westinghouse can sell support and defense of the technology to its customers in the licensing process.

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 services 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.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite developing testing and analytical methods and performing tests.

Further the deponent sayeth not.

Westinghouse

WCAP - 15615, Revision 1

WCAP - 15617, Revision 0