



Westinghouse Electric Company LLC

2000 Day Hill Road
Windsor, CT 06095
USA

9 April, 2001
LD-2001-0024

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

**SUBJECT: SUBMITTAL OF "-A" ACCEPTED VERSION OF CENPD-132, SUPPLEMENT 4-P
(ENCLOSURE 1 CONTAINS PROPRIETARY INFORMATION)**

- Reference(s): 1) Letter, S. A. Richards (NRC) to P. W. Richardson (Westinghouse), "Safety Evaluation of Topical Report CENPD-132, Supplement 4, Revision 1, 'Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model', (TAC No. MA5660)", December 15, 2000
- 2) CENPD-132, Supplement 4-P, Revision 1, "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model", August 2000

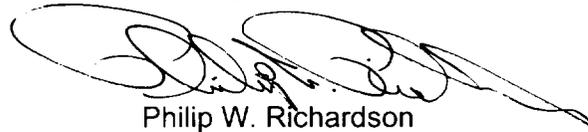
On December 15, 2000 (Reference) the Nuclear Regulatory Commission (NRC) issued its Safety Evaluation Report (SER) for CENPD-132, Supplement 4-P, Revision 1, "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model" (Reference 2). In accordance with the NRC's request, Westinghouse herewith is submitting the "-A" Accepted version of the subject topical report. Enclosures 1 and 2 provide six (6) proprietary and three (3) non-proprietary copies, respectively, for your use.

Westinghouse Electric Company LLC has determined that CENPD-132, Supplement 4-P-A (Enclosure 1) contains information that is proprietary in nature. Consequently, it is requested that the topical report be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and that these copies be appropriately safeguarded. The reasons for the classification of this information as proprietary are delineated in the affidavit provided in Enclosure 3.

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If you have any questions regarding this matter, please do not hesitate to call Chuck Molnar of my staff at (860) 285-5205.

Very truly yours,
Westinghouse Electric Company LLC

A handwritten signature in black ink, appearing to read "Philip W. Richardson", written over a horizontal line.

Philip W. Richardson
Licensing Project Manager
Windsor Nuclear Licensing

Enclosure(s): As stated

xc: J. S. Cushing (w/o enclosure, NRC)

WESTINGHOUSE ELECTRIC COMPANY LLC
PROPRIETARY INFORMATION

WESTINGHOUSE ELECTRIC COMPANY LLC

CENPD-132, SUPPLEMENT 4-P-A
CALCULATIVE METHODS FOR THE CE NUCLEAR POWER
LARGE BREAK LOCA EVALUATION MODEL

April 2001

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CENPD-132, SUPPLEMENT 4-NP-A
CALCULATIVE METHODS FOR THE CE NUCLEAR POWER
LARGE BREAK LOCA EVALUATION MODEL

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CENPD-132, SUPPLEMENT 4-P-A
CALCULATIVE METHODS FOR THE CE NUCLEAR POWER
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PROPRIETARY AFFIDAVIT

AFFIDAVIT PURSUANT TO 10 CFR 2.790

I, Philip W. Richardson, depose and say that I am the Licensing Project Manager, Windsor Nuclear Licensing, of Westinghouse Electric Company LLC (WEC), duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

CENPD-132, Supplement 4-P-A, "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model", March 2001

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by WEC in designating information as a trade secret, privileged or as confidential commercial or financial information. Pursuant to the provisions of 10 CFR 2.790(b)(4) 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, included in the above referenced document, should be withheld.

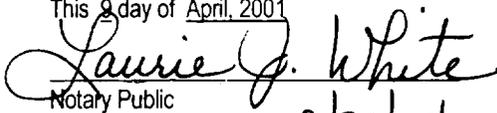
1. The information sought to be withheld from public disclosure, is owned and has been held in confidence by WEC. It consists of the methodology for the evaluation of LOCA pursuant to 10 CFR 50, Appendix K, comparisons to experimental data for model verification and comparison to the previously approved methodology.
2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to WEC.
3. The information is of a type customarily held in confidence by WEC and not customarily disclosed to the public. WEC 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.
4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.
5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
6. Public disclosure of the information is likely to cause substantial harm to the competitive position of WEC because:
 - a. A similar product is manufactured and sold by major pressurized water reactor competitors of WEC.
 - b. Development of this information by WEC required hundreds of thousands of dollars and thousands of man-hours of effort. A competitor would have to undergo similar expense in generating equivalent information.
 - c. In order to acquire such information, a competitor would also require considerable time and inconvenience to develop methodology for the evaluation of LOCA pursuant to 10 CFR 50, Appendix K, comparisons to experimental data for model verification and comparison to the previously approved methodology.
 - d. The information consists of methodology for the evaluation of LOCA pursuant to 10 CFR 50, Appendix K, comparisons to experimental data for model verification and comparison to the previously approved methodology, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with WEC, take marketing or other actions to improve their product's position or impair the position of WEC's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
 - e. In pricing WEC's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of WEC's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.
 - f. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on WEC's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.



Philip W. Richardson
Licensing Project Manager
Windsor Nuclear Licensing

Sworn to before me
This 9 day of April, 2001



Notary Public

My commission expires: 8/31/04