

**Westinghouse Electric Company LLC Report
A-GEN-FE-0118, Revision 0
“Isotopic Number Densities for
Discharged Westinghouse 17x17 Fuel Assemblies”
Westinghouse Proprietary Class 2**

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A-GEN-FE-0118, Revision 0
“Isotopic Number Densities for
Discharged Westinghouse 17x17 Fuel Assemblies”
Westinghouse Non-proprietary**

WESTINGHOUSE ELECTRIC COMPANY LLC

A-GEN-FE-0118, REV. 00

**ISOTOPIC NUMBER DENSITIES FOR DISCHARGED
WESTINGHOUSE 17X17 FUEL ASSEMBLIES**

JANUARY 2002



Title: Isotopic Number Densities for Discharged Westinghouse 17X17 Fuel Assemblies

Document Number: A-GEN-FE-0118 Revision Number: 00

1. Verification Status:

Complete Not Required Complete with Contingencies / Assumptions

2. Approval of Completed Analysis

This Design Analysis is complete and verified. Management authorizes the use of its results and attests to the qualification of the Cognizant Engineer(s), Mentor and Independent Reviewer(s).

	Printed Name	Signature	Date
Cognizant Engineer	Prakash A. Narayanan		
Mentor <input checked="" type="checkbox"/> None			
Independent Reviewer	Paul F. O'Donnell		
Management Approval	Jeffrey A. Brown		

3. Package Contents (this section may be completed after Management approval):

Total page count, including body, appendices, attachments, etc. 77

List associated CD-ROM disk Volume Numbers and path names: None

CD-ROM Volume Numbers	Path Names (to lowest directory which uniquely applies to this document)
	../dms/commit/a_gen_fe/0118r00/out
	../dms/commit/a_gen_fe/0118r00/tar

Other attachments (specify): None

4. Distribution:

QR(2)



Record Of Revisions

Rev. No.	Issue Date	Author	Independent Reviewer	Management Approver	Revised Pages			Net Revised Contents		
					Replaced	Added	Deleted	Body	Appendix & Attachs.	Other
00	11/15/2000	P.A. Narayanan	P.F.O'Donnell	J.A. Brown	n/a	n/a	n/a	61	App. A : 6 App. B : 10	CDROM



Table of Contents

RECORD OF REVISIONS	2
TABLE OF CONTENTS	3
LIST OF TABLES	4
LIST OF FIGURES	4
ABSTRACT	5
1.0 INTRODUCTION.....	6
1.1 OBJECTIVE.....	6
1.2 METHODOLOGY.....	6
1.2.1 [].....	7
1.2.2 <i>Application to Fuel Storage Pool Calculations</i>	7
1.2.3 [].....	7
1.2.4 <i>Representation of the Fuel Assembly in [KENO based on DIT] Results</i>	8
1.3 ASSUMPTIONS.....	8
1.4 ANALYSIS RESULTS.....	9
2.0 DESIGN INPUT.....	11
3.0 ANALYSIS.....	13
3.1 [].....	13
3.2 MODELING OF AXIAL BURNUP DISTRIBUTIONS	13
4.0 RESULTS AND CONCLUSIONS.....	20
4.1 BENCHMARKING RESULTS	20
5.0 CDROM AND COMPUTER CODE LISTS.....	42
5.1 COMPUTER CODES USED IN THE DESIGN ANALYSES	42
5.2 COMPUTER JOBS ON CDROM.....	42
5.3 CONTENTS OF THE TAR FILES	45
6.0 REFERENCES	61
APPENDIX A. VERIFICATION.....	A-1
APPENDIX B. [].....	B-1



List of Tables

Table 1.2-1	Standard Material Compositions Employed in the Analysis	10
Table 2.0-1	Input Parameters for Fuel Assembly Model.....	11
Table 3.2-1	Relative Power, and Fuel and Moderator Temperatures for the [].....	16
Table 3.2-2	Relative Power, and Fuel and Moderator Temperatures for the [].....	16
Table 3.2-3	Burnup and Initial Enrichments combinations used to determine the Isotopic Number Densities.....	16
Table 4.1-1	Results of the Benchmarking Calculations	20

List of Figures

Figure 2.0-1	Geometrical View of Westinghouse 17x17 Standard Fuel Assembly	12
Figure 3.2-1	[] Model Employed in Fuel Assembly.....	17
Figure 3.2-2	[].....	18
Figure 3.2-3	[].....	19



Abstract

OBJECTIVE

- To develop a database of Number densities for the key isotopes used in Criticality Safety Analysis for the Westinghouse Standard 17X17 fuel assembly
- To use a simplified axial burnup model in generating the database

METHODOLOGY

[

]

RESULTS

- The [] model is found to adequately represent []
- The isotopic number densities necessary to model the Westinghouse 17X17 standard fuel assembly have been determined for various burnup and initial enrichment combinations

CONCLUSIONS

- This database enables us to represent the Westinghouse 17X17 fuel assembly in []. Therefore, future Criticality Analyses involving these fuel assemblies can be performed with the []



1.0 Introduction

1.1 Objective

This report presents the isotopic number densities for the Westinghouse 17X17 Standard fuel assembly. This model is based on a [] representation of the fuel assembly and is compared to a [] The isotopic number densities of the Westinghouse 17X17 fuel assembly, based on the [], for various initial enrichment and burnup combinations, are also determined. The primary objectives of this analysis are as follows:

1. to establish a []
2. to benchmark the []
3. to determine the isotopic number densities for various combinations of initial enrichment and burnup for the Westinghouse 17X17 Standard fuel assembly. These number densities will be used to model the fuel assembly in [] for criticality analyses.

1.2 Methodology

This section describes the analysis methodology employed to determine the isotopic number densities for the Westinghouse 17X17 Standard fuel assembly. The analysis methodology employs:

[] The following sections describe the application of these codes in more detail.



1.2.1 []

[

]

1.2.2 Application to Fuel Storage Pool Calculations

As noted above, the [

]

1.2.3 []

[

]



[

]

1.2.4 Representation of the Fuel Assembly in [] Results

For the purpose of spent fuel pool criticality analysis calculations, the [

]

1.3 Assumptions

There are no assumptions for this analysis



1.4 Analysis Results

The primary objectives of this analysis were accomplished; a summary of the results is as follows.

1) [

]

2) The [] was benchmarked against the [] and was found to be adequate.

3) [

]

Section 4 of this report contains the results of the above calculations and also lists the isotopic number densities.



Table 1.2-1
Standard Material Compositions Employed in the Analysis

Material	Element	Weight Fraction
Zircaloy-4	Zr	0.9829
Den. = 6.56 g/cc	Sn	0.0140
	Fe	0.0021
	Cr	0.0010
Water	SCALE Standard Composition Library w/ Den. = 0.9982 @ 293 °K	
Fresh UO ₂	Fraction of Theoretical Density = 0.95	



2.0 Design Input

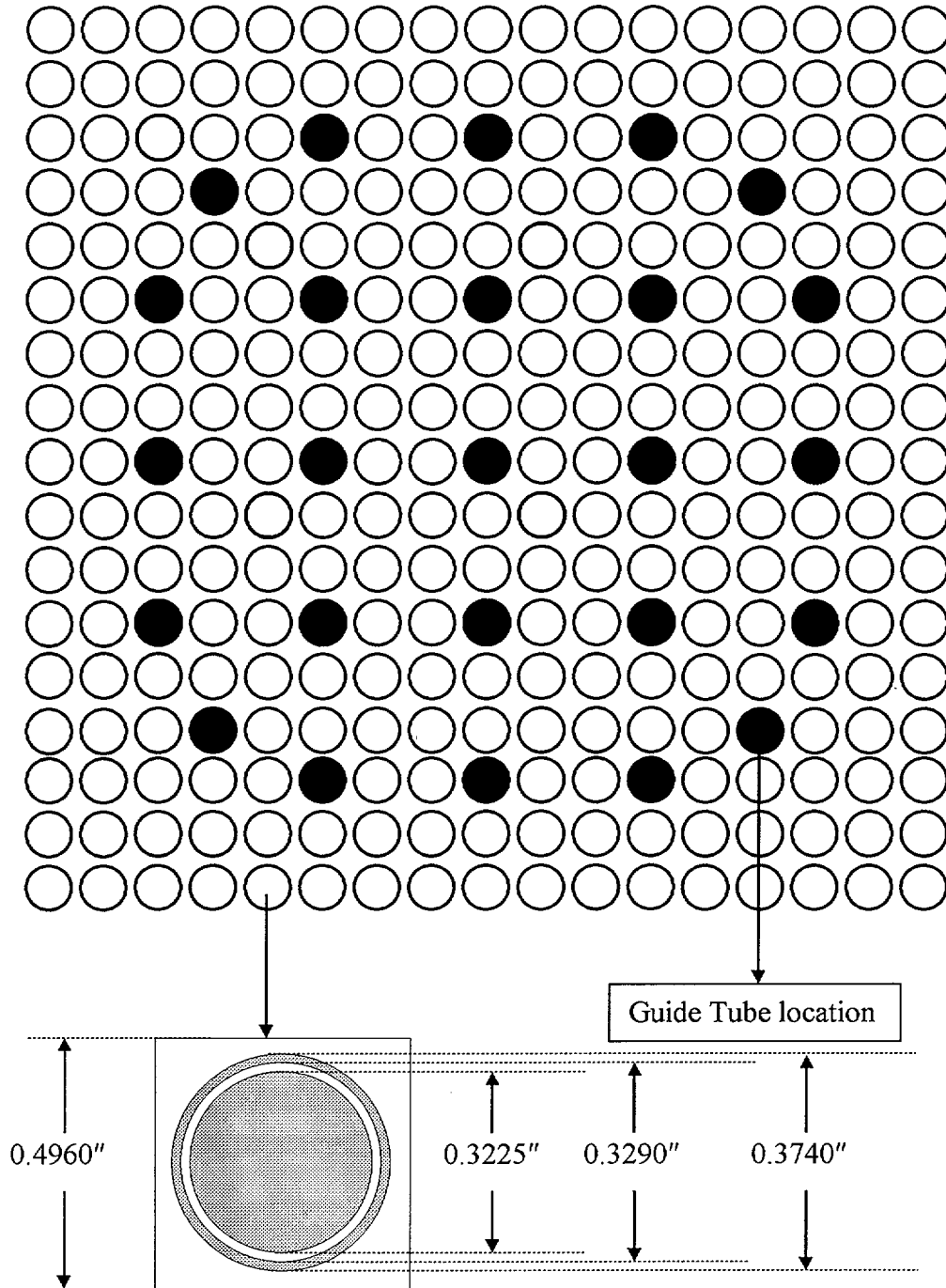
The only design input used in this analysis is the geometric description of the Westinghouse 17X17 Standard Fuel assembly. This input is derived from Table 2 (page 8) of Attachment D of Reference 5. The description of the fuel assembly data is shown in Table 2.0-1 and illustrated in Figure 2.0-1.

**Table 2.0-1
Input Parameters for Fuel Assembly Model**

Description	<u>W</u> Std.
Rods/Assy.	264
Guide Tubes/ Assy.	25
Instrument Tubes / Assy.	1
Rod Pitch, in.	0.496
Pellet OD, in.	0.3225
Pellet Density, % TD	95
Active Fuel Length, in.	144
Clad OD, in.	0.374
Clad Thickness, in.	0.0225
Clad Material	Zirc.-4
Guide Tube OD, in.	0.482
Guide Tube Thickness, in.	0.016
Guide Tube Mat.	Zirc.-4



Figure 2.0-1
Geometrical View of Westinghouse 17x17 Standard Fuel Assembly





3.0 Analysis

3.1 []

[

]

3.2 Modeling of Axial Burnup Distributions

A key aspect of the [

]



In this analysis, a [



[

]



Figure 3.2-1
Model Employed in Fuel Assembly

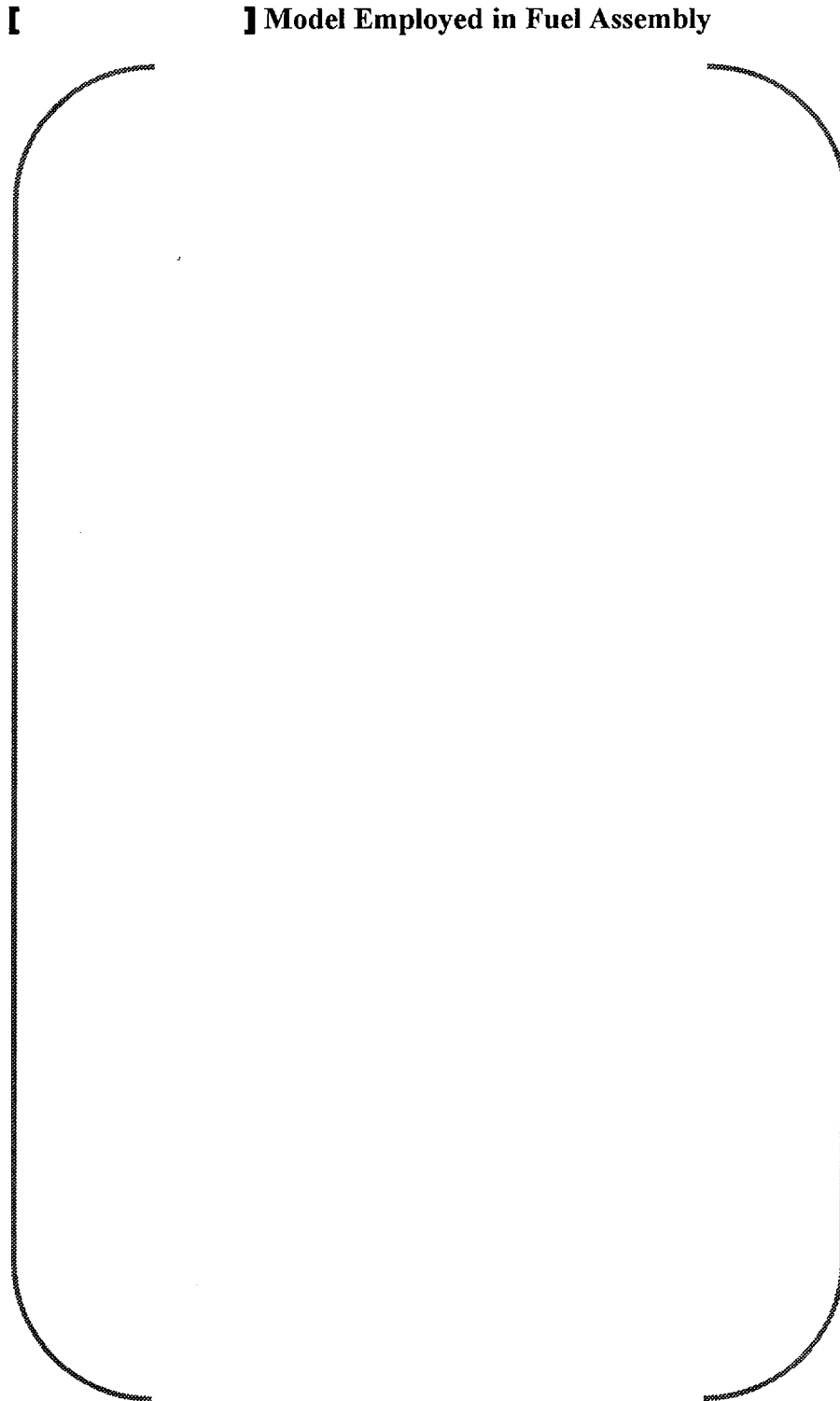




Figure 3.2-2

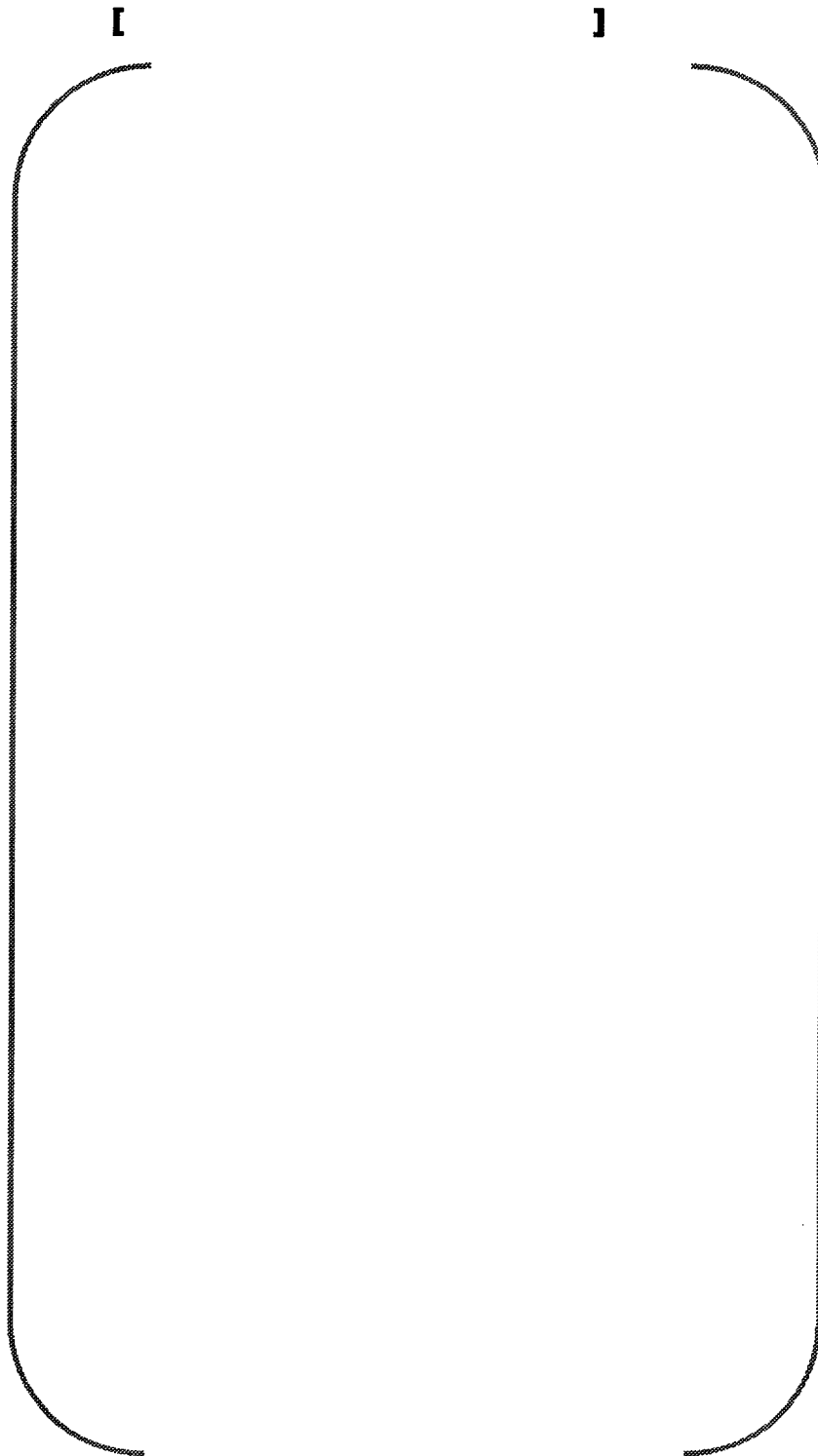
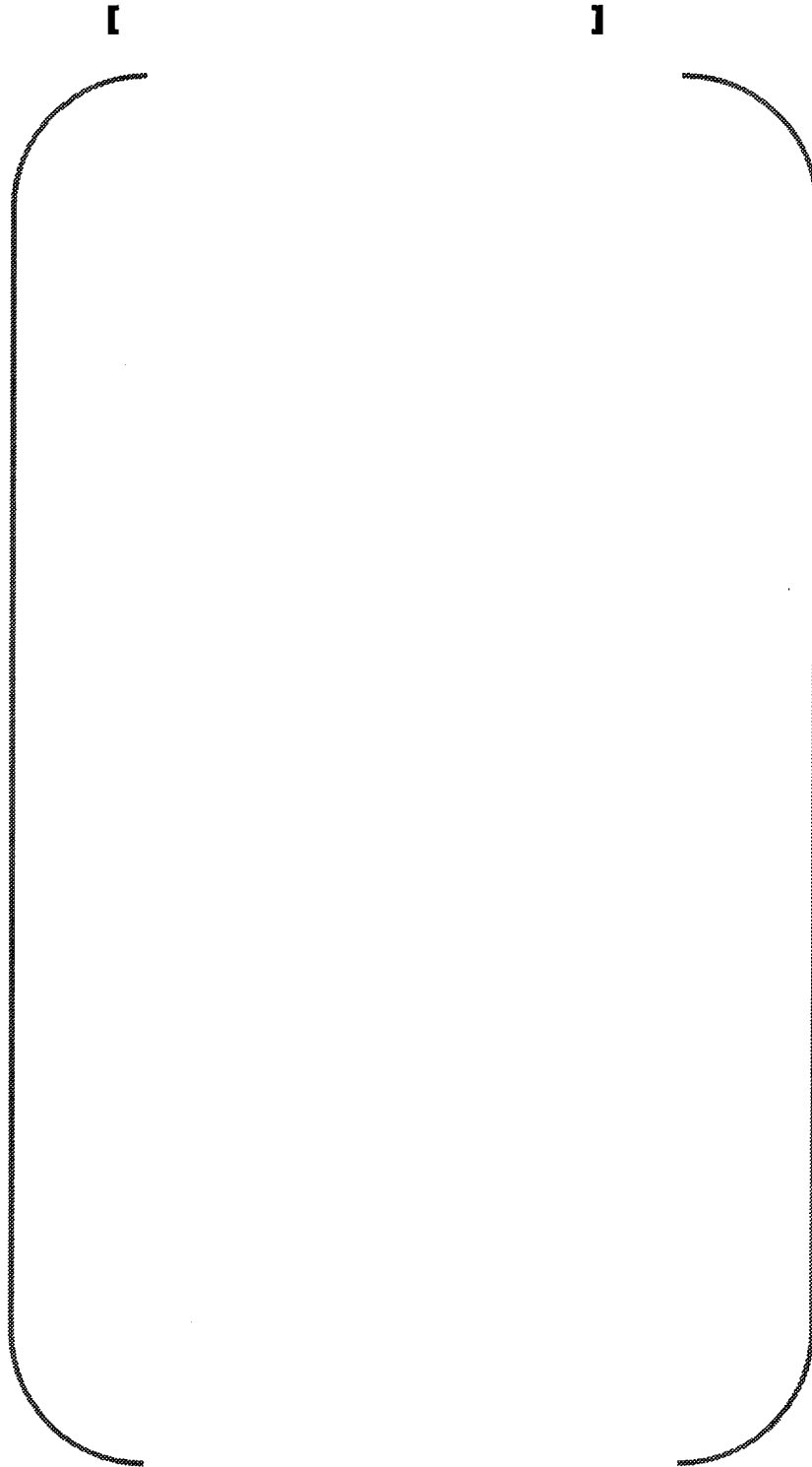




Figure 3.2-3





4.0 Results and Conclusions

4.1 Benchmarking Results

The benchmarking calculations are performed to compare the []
]. All of these benchmarking calculations have been performed using a []

]. The case details and the results are shown in Table 4.1-1.

**Table 4.1-1
Results of the Benchmarking Calculations**

These results indicate that the [] is comparable in accuracy to the []
]. All the results agree to within “2σ”, the basis for the 95/95 value. Further,
this also indicates that the []
]. This is also evidenced by the
[]

]



The isotopic number densities for the Westinghouse 17X17 fuel assembly are shown in the next several pages. These values are displayed in a format that can be directly used as

[

]. The isotopic number densities for the Westinghouse 17X17 Standard fuel assembly have been determined for the various initial enrichment and burnup combinations shown in the following table:

Burnup (MWD/MTU)	Initial Enrichment (w/o U-235)		

The number densities for these burnup and enrichment combinations are shown in the next several pages. Also, the values for the [] are also shown as part of the results. For the [] representation, the number densities are shown for [] The Pu-241 decay models are not shown in these results. However, the isotopic number densities in [] are listed as part of Computer Input and Output (Section 5) Section of this document.

In summary, a database of isotopic number densities to represent the Westinghouse 17X17 standard fuel assembly in [] has been developed. This database contains the [

]

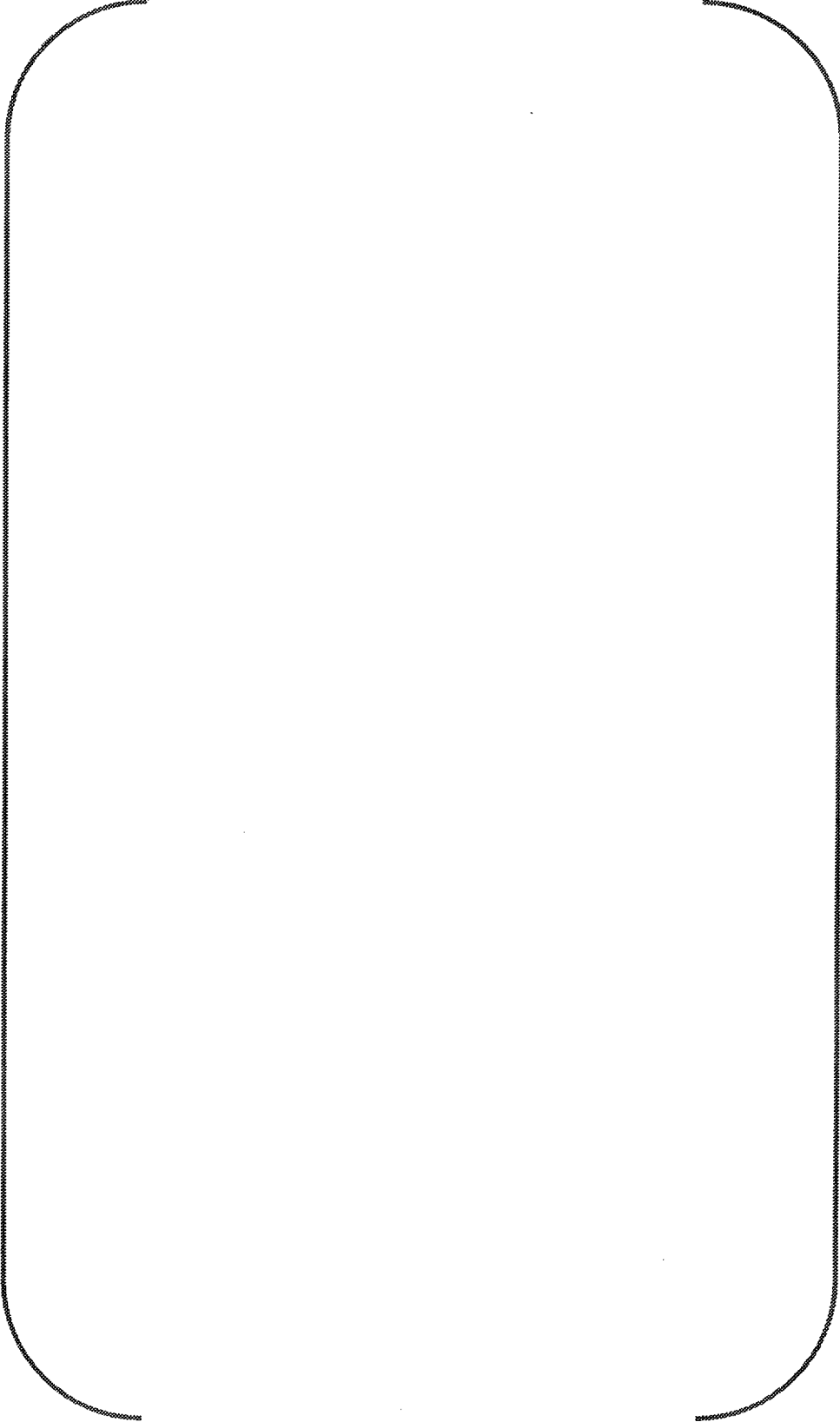


Isotopic Number Densities to be used in [

]

A large, empty rounded rectangular box with a dotted border, intended for listing isotopic number densities. The box is oriented vertically and occupies most of the page's width and height.



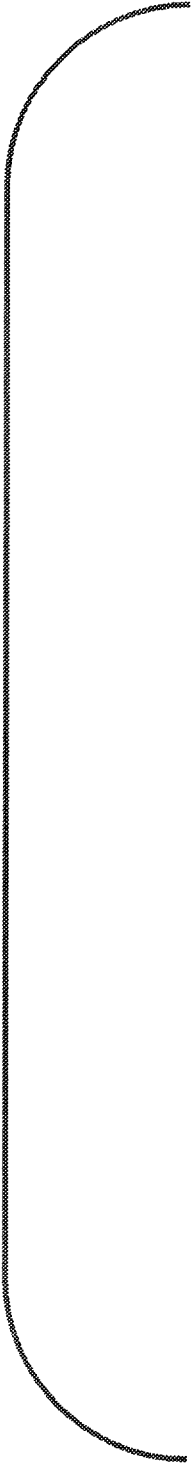


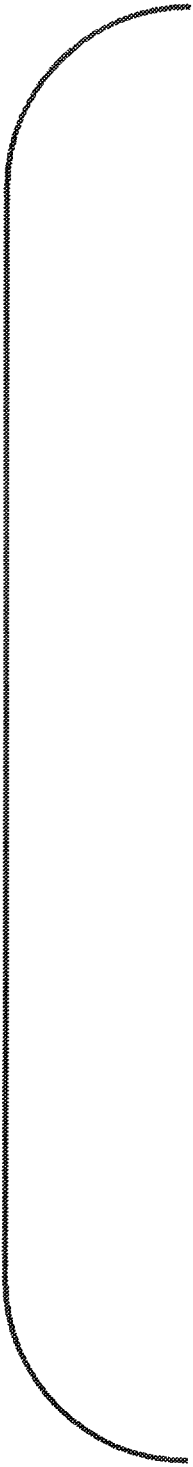


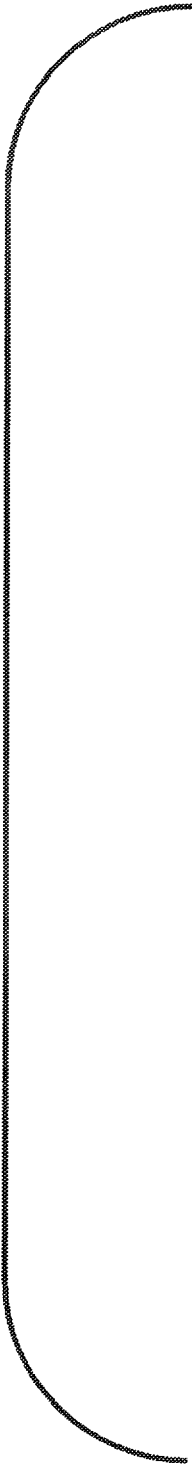


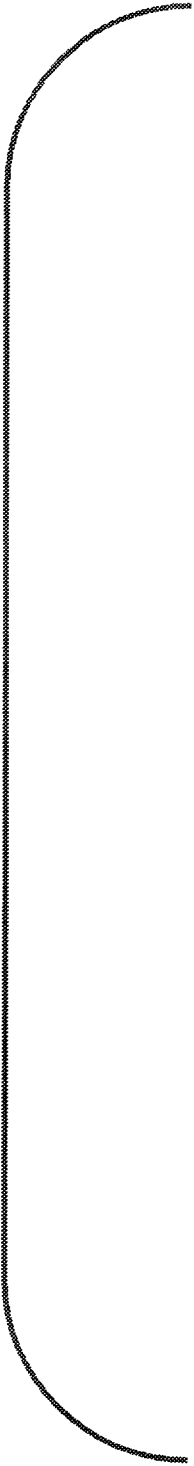
Isotopic Number Densities to be used in [

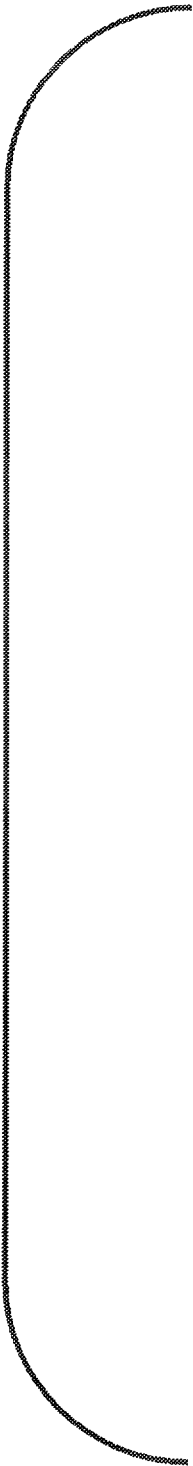
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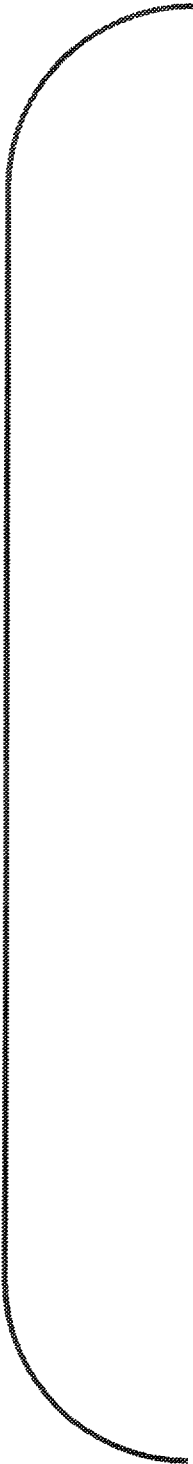


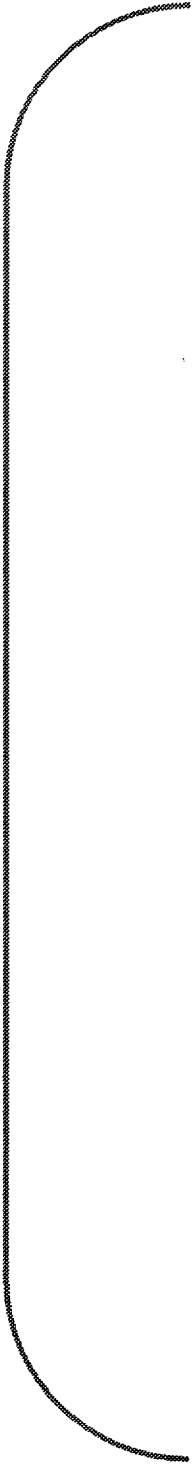


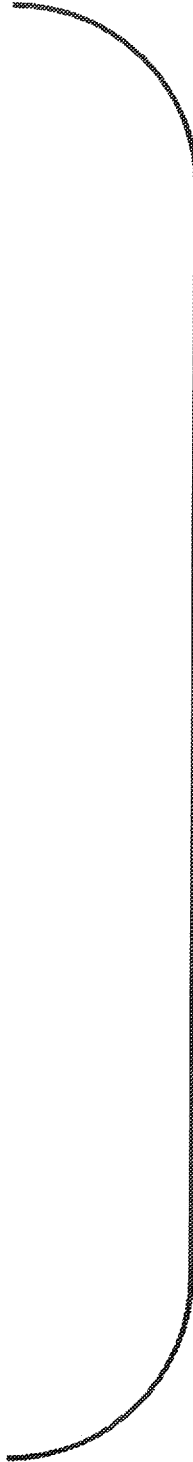
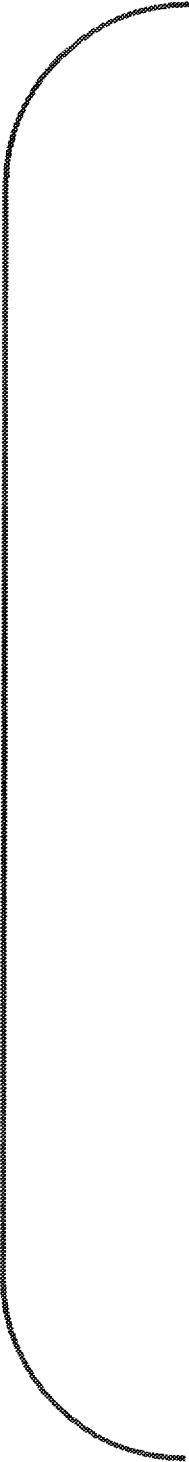


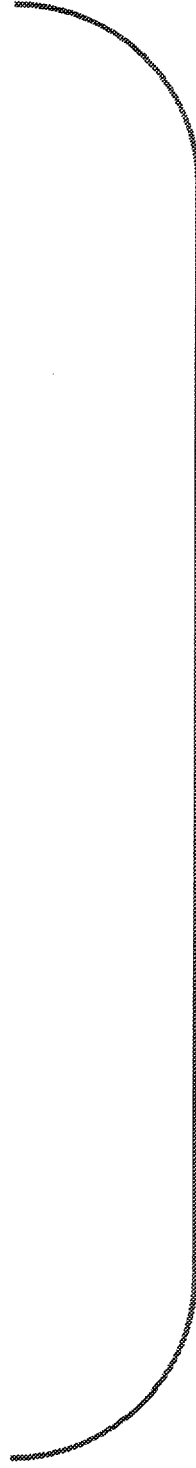
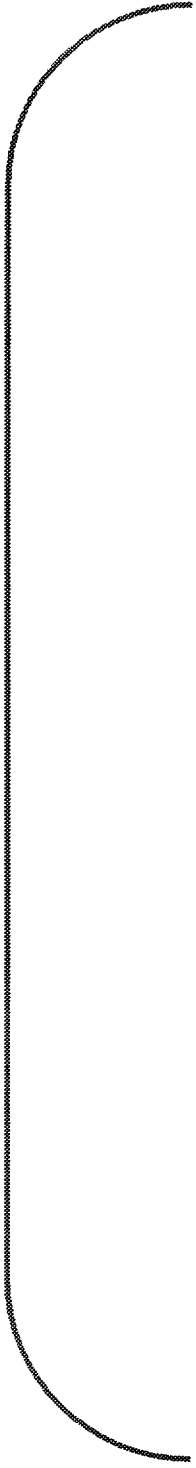


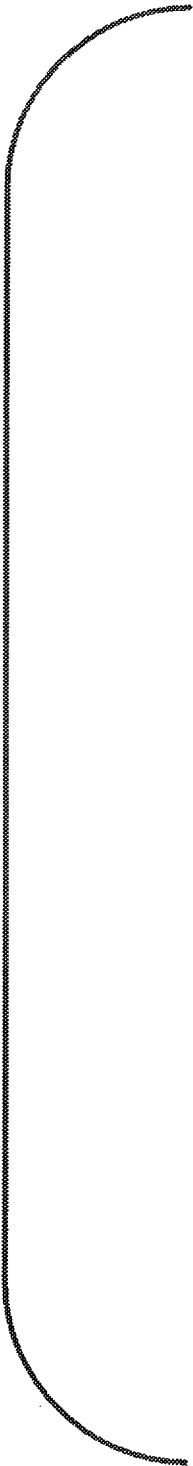


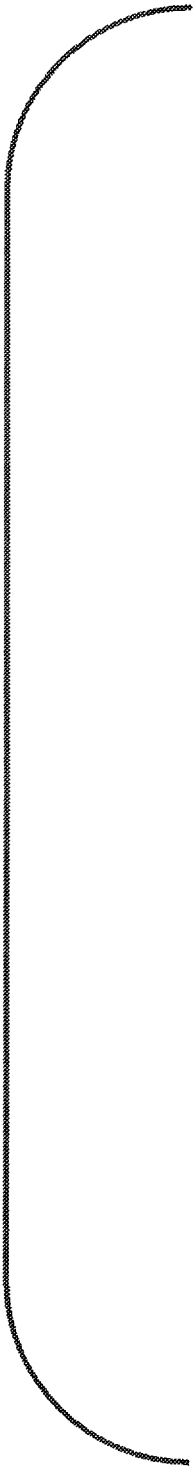


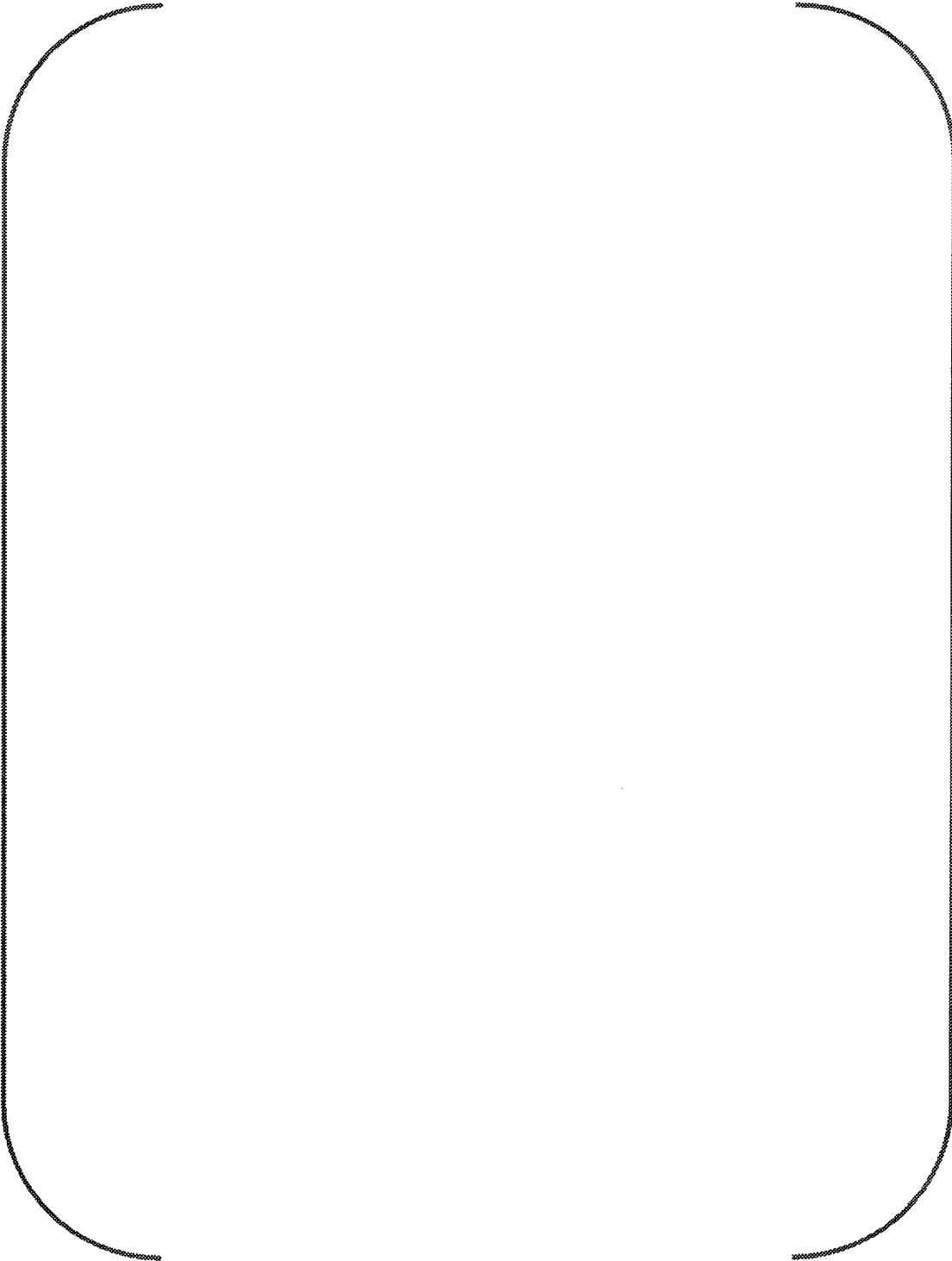


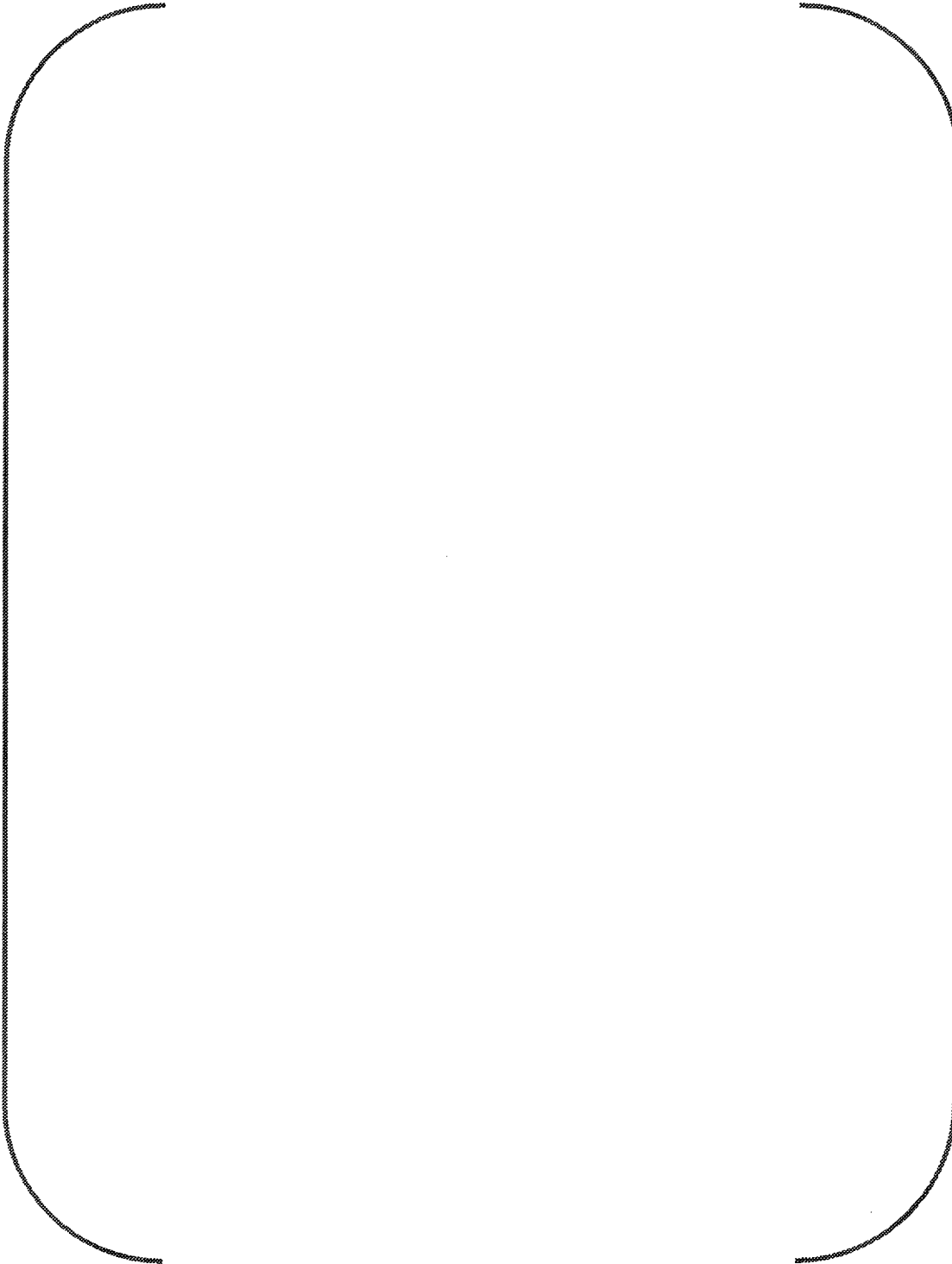


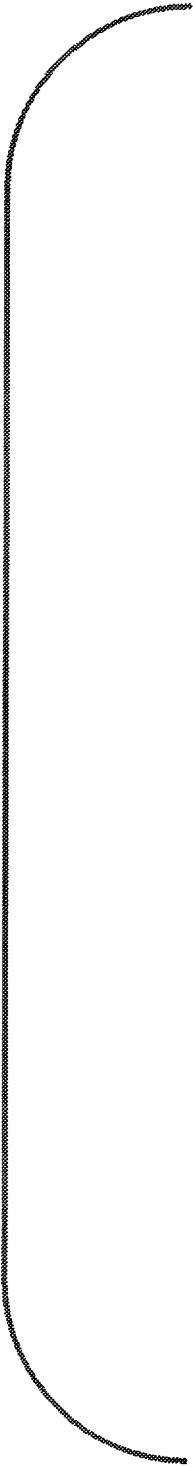
















5.3 Contents of the TAR files :

Other Computer jobs and details are provided in three “tar” files. These files are organized as follows:





6.0 References

[

2.

]

3. Application for Amendment to Facility Operating License, Revised Spent Fuel Pool Storage Requirements, March 31, 1997; with attachment: Rochester Gas & Electric R.E. Ginna Nuclear Power Plant Spent Fuel Pool Re-racking Licensing Report, February 1997, 51-1258768-01.
4. "Topical Report on Actinide-Only Burnup Credit for PWR Spent Fuel Packages", DOE/RW-0472 Rev. 2, September 1998.
5. License Amendment Request 95-01, PG&E Letter DCL-95-028, dated February 6, 1995, with attachment "Criticality Safety Evaluation of the Diablo Canyon New Fuel Vault with 5% Enrichment, Holtec Report HI-931075", October 1993.



APPENDIX A. Verification



Design Analysis Verification Checklist

Instructions: If a major topic area (generally unnumbered, bold face type such as Use of Computer Software) is not applicable, then N/A (not applicable) next to the topic may be checked and the check boxes for all items under it may be left blank. Where there is no check box under N/A for a numbered item, such a response is generally inappropriate. If N/A is checked in such a situation, document the basis at the end of this checklist in the Comments section.			
Overall Assessment	Author		IR
	Yes	N/A	Concur.
1. Are the results/conclusions correct and appropriate for their intended use?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
2. Are all limitations and contingencies on the results/conclusions documented?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Assignment of Cognizant Engineers, Independent Reviewers and Mentors			
1. If there are multiple Cognizant Engineers, has their scope been documented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. If there are multiple Independent Reviewers, has their scope been documented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. If there will be multiple Management Approvers, has their scope been documented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. If an Independent Reviewer is the supervisor or Project Manager, has authorization as an IR been documented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. If there is a Mentor, has their scope and responsibilities been adequately documented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Use of Computer Software			
For software which has been validated under QP 3.13:			
1. Is the software listed on an Approved QC-1 Software List?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the software applicable for this analysis?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
For Code-Like Constructs validated under QP 3.14:			
1. Is the Code-Like Construct listed on an Approved QC-1 Software List?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Is the Code-Like Construct applicable for this analysis?	<input type="checkbox"/>	No	<input type="checkbox"/>
3. Was the Code-Like Construct used directly in the controlled location?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- If No above, is the copy identical to the version in the controlled location? (Leave blank if not applicable.)	<input type="checkbox"/>		<input type="checkbox"/>
4. If changes were made to a Code-Like Construct to meet specific analysis needs, were such changes documented as non-validated software following para. 3.3.3? (Leave blank if not applicable. Complete the next section if "Yes".)	<input type="checkbox"/>		<input type="checkbox"/>
For software excluding spreadsheets which has not been validated under QP 3.13 or QP 3.14:			
1. Is the software identification documented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Is a copy of the software included in the Design Analysis?	<input type="checkbox"/>		<input type="checkbox"/>
3. Have tests been documented which are adequate to demonstrate correct operation for the software's intended use?	<input type="checkbox"/>		<input type="checkbox"/>
4. Is the output from the tests included in the Design Analysis?	<input type="checkbox"/>		<input type="checkbox"/>
5. Has the Cognizant Engineer documented the results of the tests and the basis for concluding the software is operating correctly for its intended use?	<input type="checkbox"/>		<input type="checkbox"/>
6. Did the software, as used in this analysis, give correct results?	<input type="checkbox"/>		<input type="checkbox"/>
For spreadsheets which have not been validated under QP 3.13 or QP 3.14:			
1. Were spreadsheets used in this Design Analysis in any way - data display, plotting, computations, etc.?	<input type="checkbox"/>	No	<input type="checkbox"/>
- If data display <u>only</u> (no computations or plotting), check "Yes" and skip remaining sub-questions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Design Analysis Verification Checklist

Use of Computer Software (continued)	Author		IR
	Yes	N/A	Concur.
- If used for computations:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Are the computations adequately documented and are the results correct?	<input type="checkbox"/>		<input type="checkbox"/>
- If used for plotting:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Is the data to be plotted correct?	<input type="checkbox"/>		<input type="checkbox"/>
• Are the plots correct in other respects? (titles, scales, labels, etc.)	<input type="checkbox"/>		<input type="checkbox"/>
2. Have tests been documented which are adequate to demonstrate correct operation for the spreadsheet's intended use?	<input type="checkbox"/>		<input type="checkbox"/>
3. Is the output from the tests included in the Design Analysis?	<input type="checkbox"/>		<input type="checkbox"/>
4. Has the Cognizant Engineer documented the results of the tests and the basis for concluding the spreadsheet is operating correctly for its intended use?	<input type="checkbox"/>		<input type="checkbox"/>
5. Has a copy of the spreadsheet file been included in the Design Analysis or has sufficient detail been included in the analysis documentation to permit recreating the spreadsheet?	<input type="checkbox"/>		<input type="checkbox"/>
Use of software with uncorrected errors:		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1. Does any of the software used have uncorrected errors?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. If yes, is the software identified and documented and has the impact of use been evaluated and documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Objective of the Design Analysis			
1. Has information necessary to define the task been included or referenced?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
2. Have the objectives been enumerated?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
3. Has the applicability and intended use of the results been documented?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Assessment of Significant Design Changes			
1. Have significant design-related changes that might impact this analysis been considered?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
2. If any such changes have been identified, have they been adequately addressed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Analytical Techniques (Methods)			
1. Are the analytical techniques (methods) described in sufficient detail to judge their appropriateness?	<input checked="" type="checkbox"/>	No	<input checked="" type="checkbox"/>
2. Are the analytical techniques used or their application governed by an NRC issued SER?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
If yes, have the applicable SERs been documented?	<input type="checkbox"/>		<input type="checkbox"/>
If yes, has the basis for concluding the analysis is in conformance been documented?	<input type="checkbox"/>		<input type="checkbox"/>
3. Have analytical techniques incorporated by reference to generic, lead plant or previous cycle analyses been previously verified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Are any modifications or departures from previously approved analytical techniques or Conventional or Automated Procedures documented and justified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. If superseded approved analytical techniques or engineering procedures are used, is their use justified and approved?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6. Does the issue date of referenced approved Conventional or Automated Procedures predate their use in this analysis?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Selection of Design Inputs			
1. Are the design inputs documented?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
2. Are the design inputs correctly selected and traceable to their source?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
3. Are the bases for selection of all design inputs documented?	<input checked="" type="checkbox"/>	No	<input checked="" type="checkbox"/>
4. Is previously unverified design input used in this analysis?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
If Yes, is it treated in accordance with QP 3.2, paragraph 3.4 for use of unverified design information?	<input type="checkbox"/>		<input type="checkbox"/>



Design Analysis Verification Checklist

Selection of Design Inputs (continued)	Author		IR
	Yes	N/A	Concur.
5. Is the verification status of design inputs transmitted from customers or Nuclear Systems appropriate and documented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is the use of customer-controlled sources such as Tech Specs, UFSARs, etc. authorized, and does the authorization specify amendment level, revision number, etc.?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Assumptions			
1. If there are no assumptions, is this documented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Are local assumptions documented, fully justified and verified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Are Internal and External Assumptions which must be cleared by CENP or the customer listed on a Contingencies and Assumptions form?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Is the Project Manager responsible for clearing the Assumptions identified on the form?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Results/Conclusions			
1. Are all results contained in or referenced in the Results/Conclusion section? (Where feasible, in the enumerated order of the objectives.)	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
2. Are all limitations on the results/conclusions and their applicability documented in this section?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
3. Are all contingencies on the results that must be cleared listed in the Results/Conclusion section or the Contingencies and Assumptions form referenced?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Is the Project Manager responsible for clearing the Assumptions or Contingencies identified on the form?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other Elements			
1. Has a comparison of the results with those of a previous cycle or similar analysis been documented and significant differences explained?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Have applicable Codes (e.g., ASME Code) and standards been appropriately referenced and applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Is the information from relevant literature searches/background data adequately documented and referenced?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Are hand calculations correct and appropriately documented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Is all applicable computer output and input included?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is all computer software used identified by name and revision identification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
References			
1. Are all references used to perform the analysis listed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Are the references as direct as possible and appropriate to the source?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
3. Is the reference notation specific to the information utilized, including revision level or date of issue, and where appropriate, identification of the location of the information in the reference, such as page, table or paragraph number?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Independent Reviewer's Statement of Verification Activities:			
<p>The IR should describe details of verification activities beyond the obvious on this checklist including, but not limited to the review of new methods, use of software under para. 3.3.3, spreadsheet use, assessment of design and methodology changes, engineering judgments, and use of previously unverified inputs.</p> <p>Check all DIT and KENO input and output. Check 4 vs. 7 zone results. Verify all B-10 number densities. Verify overall methodology.</p>			

Checklist Completed by
 Independent Reviewer:

Printed Name

Signature

Date



Design Analysis Verification Checklist

The Form and Format section of the Checklist below may be completed by a Checker under the direction of the Independent Reviewer.

Form/Format	Author		IR
	Yes	N/A	Concur.
1. Is the document legible, reproducible and in a form suitable for filing and retrieving as a Quality Record?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
2. Except as permitted by 3.1.3.a, are all pages identified with the document number, including revision number?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
3. Except as permitted by 3.1.3.a, do all pages have a unique page number?	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
4. Are all computer disks identified with the analysis number?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. Are any unverified sections of an otherwise verified analysis clearly indicated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
For a revision to a completed analysis in the "Complete Revision" and "Page Change Package" formats:			
1. Where practical, have changes and additions been identified by mechanisms such as vertical lines, etc.?	<input type="checkbox"/>		<input type="checkbox"/>
2. Where practical, have deletions been identified by mechanisms such as strike outs, etc.?	<input type="checkbox"/>		<input type="checkbox"/>
3. Have indications of change in previous revisions been removed?	<input type="checkbox"/>		<input type="checkbox"/>
4. Does the distribution of the revision include those on the distribution of the previous revision?	<input type="checkbox"/>		<input type="checkbox"/>
For a "Complete Revision":			
1. Have the title and document number been preserved without change?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Has the revision number been incremented by one?	<input type="checkbox"/>		<input type="checkbox"/>
For a "Page Change Package":			
1. Are pages numbered in accordance with the original analysis?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Are instructions provided for the insertion and deletion of revised pages?	<input type="checkbox"/>		<input type="checkbox"/>
3. Has a new Title Page been prepared?	<input type="checkbox"/>		<input type="checkbox"/>
4. Does the Package Contents Page reflect the composite document?	<input type="checkbox"/>		<input type="checkbox"/>

Form/Format section completed by the Independent Reviewer.

Form/Format section completed by the Checker identified below:

Checker Name: _____ Signature: _____



APPENDIX B. [

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**Westinghouse Electric Company LLC Proprietary Affidavit
and Copyright Notice for
Westinghouse Electric Company LLC Report
A-GEN-FE-0118, Revision 0
“Isotopic Number Densities for
Discharged Westinghouse 17x17 Fuel Assemblies”
Westinghouse Proprietary Class 2**

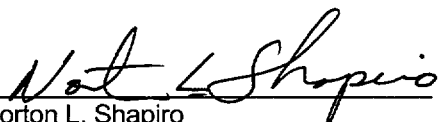
I, Norton L. Shapiro, depose and say that I am the Advisory Engineer, CE Engineering Technology, of Westinghouse Electric Company LLC (WEC), duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and described below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the application of Pacific Gas & Electric Company for withholding this information. 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.

The information for which proprietary treatment is sought, and which documents have been appropriately designated as proprietary, is contained in the following:

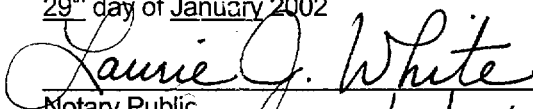
*A-GEN-FE-0118, Rev. 00, "Isotopic Number Densities for Discharged Westinghouse 17x17 Fuel Assemblies",
November 15, 2000*

Pursuant to the provisions of Section 2.790(b)(4) of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information included in the documents listed above should be withheld from public disclosure.

- i. The information sought to be withheld from public disclosure is owned and has been held in confidence by WEC. It consists of details of the methodology for determining isotopic number densities for discharged fuel assemblies.
- ii. The information consists of analyses or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to WEC.
- iii. The information is of a type customarily held in confidence by WEC and not customarily disclosed to the public.
- iv. 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.
- v. 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 that provide for maintenance of the information in confidence.
- vi. Public disclosure of the information is likely to cause substantial harm to the competitive position of WEC because:
 - a. A similar product or service is provided by major competitors of Westinghouse.
 - b. WEC has invested substantial funds and engineering resources in the development of this information. A competitor would have to undergo similar expense in generating equivalent information.
 - c. The information consists of the methodology for determining isotopic number densities for discharged fuel assemblies, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to design their product or service 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 technical analysis in support of their processes, methods or apparatus.
 - d. Significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included in pricing WEC's products and services. 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.
 - e. Use of the information by competitors in the international marketplace would increase their ability to market comparable products or services 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 licenses.


Norton L. Shapiro
Advisory Engineer, CE Engineering Technology
Westinghouse Electric Company LLC

Sworn to before me this
29th day of January 2002


Notary Public
My commission expires: 8/31/04

Westinghouse Electric Company LLC

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