



Westinghouse Electric Company
Engineering Services Integration
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USA

29-May-02
LTR-NRC-02-28

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

SUBJECT: ADVANCED DRAFT COPY OF CENTS UPDATE MEETING SLIDE PACKAGE
[ENCLOSURE 1-P CONTAINS WESTINGHOUSE PROPRIETARY CLASS 2 MATERIAL]

- Reference(s):
1. CENPD-282-P-A, "Technical Manual for the CENTS Code, Volumes 1 and 2", February, 1991
CENPD-282-P-A, "Technical Manual for the CENTS Code, Volume 3", February, 1991
CENPD-282-P-A, Supplement 1, "Technical Manual for the CENTS Code", June, 1993
CENPD-282-P-A, "Technical Manual for the CENTS Code, Volume 4", December, 1994
 2. Letter, M. J. Virgilio (NRC) to S. A. Toelle (CE), "Acceptance for Referencing of Licensing Topical Report CE-NPD 282-P, Technical Manual for the CENTS Code (TAC No. M82718)", March 17, 1994
 3. Letter, R. C. Jones (NRC) to S. A. Toelle (CE), "Acceptance for Referencing of Licensing Topical Report CE-NPD 282-P, Volume 4, Technical Manual for the CENTS Code (TAC No. M85911)", February 24, 1995 {This approval is for Westinghouse plants, therefore, it was not reviewed.}

Enclosed herewith (Enclosure 1-P) is a copy of the *PROPRIETARY* version of presentation material to be used at a forthcoming Nuclear Regulatory Commission (NRC)/Westinghouse meeting regarding a revision to the CENTS computer code (Reference 1). For the sake of compactness the slides have been printed two per page and double-sided. CENTS was reviewed and approved by the NRC for application to Combustion Engineering and Westinghouse designed Pressurized Water Reactors (PWRs) for the analysis of non-LOCA transients (References 2 and 3, respectively). Westinghouse reserves the right to update this *DRAFT* material as necessary and appropriate to prepare the *FINAL* meeting materials; which will be provided to the NRC at the time of the meeting.

Westinghouse has determined that the information contained in Enclosure 1-P is *PROPRIETARY* in nature. Consequently, it is requested that this information be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and that copies of the information be appropriately safeguarded. The reasons for the classification of this information as *PROPRIETARY* are delineated in the affidavit provided in Enclosure 2.

Toot
yGol
Add: G. S. Shukla

A BNFL Group company

If you have any questions regarding this matter, please do not hesitate to call Chuck Molnar of my staff at (860) 731-6286.

Very truly yours,
Westinghouse Electric Company LLC

A handwritten signature in black ink, appearing to read "Ian C. Rickard", written over a horizontal line.

Ian C. Rickard
Licensing Project Manager
Windsor Nuclear Licensing

Enclosure(s): As stated
xc: Enclosures
G. S. Shukla (NRC)

WESTINGHOUSE ELECTRIC COMPANY LLC

PROPRIETARY AFFIDAVIT

FOR

CENTS METHODOLOGY IMPROVEMENTS SUBMITTAL

Proprietary Affidavit

I, Ian. C. Rickard, 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 described 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. 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:

Enclosure 1-P to LTR-NRC-02-28, "CENTS Methodology Improvements Submittal", May 2002

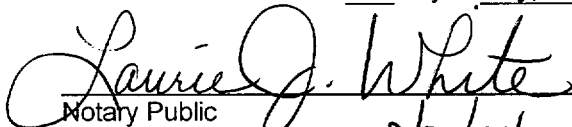
Pursuant to the provisions of Section 2.790(b)(4) of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information included in the documents listed above should be withheld from public disclosure.

- i. The information sought to be withheld from public disclosure is owned and has been held in confidence by WEC. It consists of information concerning enhanced analysis methodologies for the design and evaluation of CE and W designed PWRs.
- ii. The information consists of test data or other similar data for the design, development and implementation of enhanced analysis methodologies for the design and evaluation of CE and W designed PWRs, 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 is manufactured and sold by major competitors of WEC.
 - b. WEC 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 enhanced analysis methodologies for the design and evaluation of CE and W designed PWRs, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to design 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 technical analysis in support of their processes, methods or apparatus.
 - d. 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.
 - e. Use of the information by competitors in the international marketplace would increase their ability to market a competing product, reducing the costs associated with their technology development.



Ian. C. Rickard
Licensing Project Manager
Westinghouse Electric Company LLC

Sworn to before me this 29nd day of May, 2002



Notary Public
My commission expires: 8/31/04

Westinghouse Electric Company LLC

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