



OG-02-022  
June 6, 2002

WCAP-15791-P, Rev. 0  
WCAP-15791-NP, Rev. 0  
Project Number 694

**Domestic Members**

AmerenUE  
Callaway  
American Electric Power Co.  
D.C. Cook 1 & 2  
Carolina Power & Light Co.  
H.B. Robinson 2  
Shearon Harris  
Dominion Nuclear Connecticut  
Millstone 3  
Dominion Virginia Power  
North Anna 1 & 2  
Surry 1 & 2  
Duke Power Company  
Catawba 1 & 2  
McGuire 1 & 2  
Entergy Nuclear Operations Inc.  
Indian Point 2 & 3  
Exelon Generation Company LLC  
Braidwood 1 & 2  
Byron 1 & 2  
FirstEnergy Nuclear  
Operating Co.  
Beaver Valley 1 & 2  
Florida Power & Light Co.  
Turkey Point 3 & 4  
Northeast Utilities  
Seabrook  
Nuclear Management Co.  
Point Beach 1 & 2  
Prairie Island 1 & 2  
Kewaunee  
Pacific Gas & Electric Co.  
Diablo Canyon 1 & 2  
PSEG - Nuclear  
Salem 1 & 2  
Rochester Gas & Electric Co.  
R.E. Ginna  
South Carolina Electric  
& Gas Co.  
V.C. Summer  
STP Nuclear Operating Co.  
South Texas Project 1 & 2  
Southern Nuclear  
Operating Co.  
J.M. Farley 1 & 2  
A.W. Vogtle 1 & 2  
Tennessee Valley Authority  
Sequoyah 1 & 2  
Watts Bar 1  
TXU Electric  
Commanche Peak 1 & 2  
Wolf Creek Nuclear  
Operating Corp.  
Wolf Creek

**International Members**

Electrabel  
Doel 1, 2, 4  
Tihange 1, 3  
Electricite de France  
Kansai Electric Power Co.  
Mihama 1  
Takahama 1  
Ohi 1 & 2  
Korea Hydro & Nuclear Power Co.  
Kori 1 - 4  
Yonggwang 1 & 2  
British Energy plc  
Sizewell B  
Krsko  
Krsko  
Spanish Utilities  
Asco 1 & 2  
Vandellos 2  
Almaraz 1 & 2  
Ringhals AB  
Ringhals 2 - 4  
Taiwan Power Co.  
Maanshan 1 & 2

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Chief, Information Management Branch,  
Division of Program Management,  
Policy Development and Analysis Staff

Subject: Westinghouse Owners Group  
**Transmittal of Reports: WCAP-15791-P, Rev. 0, (Proprietary)**  
**and WCAP-15791-NP, Rev. 0, (Non-Proprietary), Entitled**  
**“Risk-Informed Evaluation of Extensions to Containment**  
**Isolation Valve Completion Times” (MUHP-3010)**

This letter transmits five (5) copies of the report WCAP-15791-P, Rev. 0, (Proprietary) and three (3) copies of the report WCAP-15791-NP, Rev. 0, (Non-Proprietary), entitled “Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times,” dated May 2002. The Westinghouse Owners Group is submitting this topical report, WCAP-15791, Rev. 0, under the NRC licensing topical report program for review and acceptance for referencing in licensing actions. WCAP-15791, provides the technical justification necessary to support licensees in amending their Technical Specifications. The objective is that once approved, each WOG member may reference this report in amending their Technical Specifications.

Also enclosed are:

1. One (1) copy of the Application of Withholding Proprietary Information from Public Disclosure, CAW-02-1528 (Non-Proprietary).
2. One (1) copy of Affidavit CAW-02-1528 (Non-Proprietary).
3. One (1) copy of the Copyright Notice.
4. One (1) copy of the Proprietary Information Notice.

WCAP-15791 provides the technical justification for extending the Completion Time (CT) for the Containment Isolation Valves (CIVs), from 4 hours to a maximum of 7 days if the full 7 days could not be justified, shorter times were

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evaluated and in most cases justified. These CIV CT extensions will provide sufficient time for plant personnel to address CIV inoperabilities, and to perform preventive maintenance activities on the CIVs during power operation. Wolf Creek Generating Station is the lead plant for implementation of WCAP-15791.

The approach used in WCAP-15791 is consistent with Regulatory Guides 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Current Licensing Basis" and 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." WCAP-15791 addresses the impact on defense-in-depth and the impact on safety margins, as well as an evaluation of the impact on risk.

Consistent with the practice for all Topical Reports associated with changes to NUREG-1431, a traveler (TSTF) will be developed that contains the Technical Specification and Bases changes contained in Appendix A of WCAP-15791. The traveler will be submitted to the NRC via the NEI Risk Informed Tech Spec Task Force.

The WOG requests that the NRC complete the review of WCAP-15791, by February 28, 2003. Consistent with the Office of Nuclear Reactor Regulation, Office Instruction LIC-500, "Processing Request for Reviews of Topical Reports," the WOG requests that the NRC provide an estimate of the review hours, and target dates for any Request(s) for Additional Information and for completion of the Safety Evaluation for WCAP-15791.

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 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.

As this report, WCAP-15791-P, Rev. 0, contains information proprietary to Westinghouse Electric Company, it is being transmitted with affidavits signed by Westinghouse, the owner of the information. The affidavits set forth the basis on which the information be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, it is respectfully requested

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that the information which is proprietary be withheld from public disclosure in accordance with 10CFR Section 2.790 of the Commission's regulations.

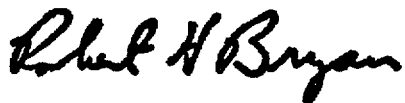
Correspondence with respect to the proprietary aspect of the Applications for Withholding or the supporting Westinghouse affidavits should reference CAW-02-1528 as appropriate and should be addressed to Mr. H.A. Sepp, Manager, Regulatory and Licensing Engineering, Westinghouse Electric Company, P. O. Box 355, Pittsburgh, PA 15230-0355.

Invoices associated with the review of this WCAP should be addressed to:

Mr. Gordon Bischoff  
Owners Group Program Manager  
Westinghouse Electric Company  
Mail Stop ECE 5-16  
P.O. Box 355  
Pittsburgh, PA 15230-0355

If you require further information, please contact Mr. Ken Vavrek in the Owners Group Program Management Office at 412-374-4302.

Very truly yours,



Robert H. Bryan, Chairman  
Westinghouse Owners Group

Enclosures

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cc: WOG Steering Committee (1L)  
WOG Primary Representatives (1L)  
WOG Licensing Subcommittee Representatives (1L)  
B. Barron, Duke Energy (1L)  
G. Shukla, USNRC OWFN 07 E1 (1L, 1E, 1R)  
H.A. Sepp, Westinghouse (1L, 1E)  
G. C. Bischoff, Westinghouse (1L)



Westinghouse Electric Company  
Nuclear Services  
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Attention: Chief, Information Management Branch  
Division of Program Management  
Policy Development and Analysis Staff

Our ref: CAW-02-1528

June 4, 2002

**APPLICATION FOR WITHHOLDING PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE**

Subject: WCAP-15791-P, Rev. 0, Entitled, "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-02-1528 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 the Westinghouse Owners Group.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-02-1528 and should be addressed to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "H. A. Sepp".

H. A. Sepp, Manager  
Regulatory and Licensing Engineering

Enclosures

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

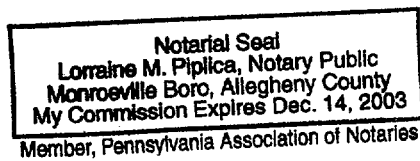
COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Henry A. Sepp, 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:

Henry A. Sepp  
Henry A. Sepp, Manager  
Regulatory and Licensing Engineering

Sworn to and subscribed  
before me this 4th day  
of June, 2002

Lorraine M. Piplica  
Notary Public



- (1) I am Manager, Regulatory and Licensing Engineering, in the Nuclear Services, 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 Westinghouse Electric Company, LLC.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR 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 the following areas of potential competitive advantage:

- (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 10 CFR 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.



- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WCAP-15791, "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times," (Proprietary), May 2002 on behalf of the Westinghouse Owners Group by Westinghouse Electric Co., being transmitted by the Westinghouse Owners Group letter and Application for Withholding Proprietary Information from Public Disclosure, Mr. Robert H. Bryan, Chairman, Westinghouse Owners Group to Document Control Desk. The proprietary information as submitted for use by the Westinghouse Owners Group is applicable to other licensee submittals.

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

- (a) Evaluate the impact of changes to containment isolation requirements on containment isolation reliability and on plant risk.
- (b) Assist the customers in the licensing and NRC approval of the Technical Specification changes associated with this program.

Further this information has substantial commercial value as follows:

- (a) Westinghouse can contract with utilities to implement these Technical Specification changes to their plants and to also perform a plant specific analysis that will allow additional Technical Specification improvements.
- (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 calculation, evaluation 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 talent and experience, would have to be expended for development of analytical techniques and data in support of this program.

Further the deponent sayeth not.

## **COPYRIGHT NOTICE**

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## **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 version is contained within brackets, and where the proprietary information has been deleted in the non-proprietary version, 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) 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).