



Westinghouse Electric Company
Engineering Services Integration
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USA

Project No. 700

12 September, 2002
LTR-NRC-02-46

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

SUBJECT: SUBMITTAL OF WCAP-15689-P, REVISION 1

- References:
1. Letter, I. C. Rickard (Westinghouse) to U.S. NRC Document Control Desk, "Evaluation of Transit-Time and Cross-Correlation Ultrasonic Flow Measurement Experience With Nuclear Plant Feedwater Flow Measurement", LTR-NRC-02-14, April 3, 2002
 2. Letter, I. C. Rickard (Westinghouse) to U.S. NRC Document Control Desk, "Westinghouse Response to NRC RAIs Regarding WCAP-15689-P", LTR-NRC-02-36, July 17, 2002

On April 3, 2002, Westinghouse Electric Company LLC (Westinghouse) submitted WCAP-15689-P, Rev. 0, "Evaluation of Transit-Time and Cross-Correlation Ultrasonic Flow Measurement Experience With Nuclear Plant Feedwater Flow Measurement" to the Nuclear Regulatory Commission (NRC) for information (Reference 1). During its review of this topical report the NRC reviewer identified the need to Request Additional Information (RAI). On July 17, 2002, Westinghouse and its CROSSFLOW partner Advanced Measurement and Analysis Group (AMAG) provided responses to the NRC RAI request (Reference 2).

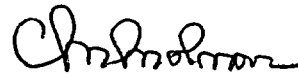
In conjunction with the NRC's RAI request, Westinghouse/AMAG reconsidered the proprietary classification of certain material contained in WCAP-15689-P, Rev. 0 and has determined that it can downgrade that material to a non-proprietary status. This submittal completes a Westinghouse commitment to provide a revision to both WCAP-15689-P and WCAP-15689-NP to bring their proprietary markings into alignment with the proprietary information reclassification performed as part of the RAI activity. Additionally, for the purpose of completeness, Westinghouse has incorporated the RAI responses (Reference 2) into Appendix C of WCAP-15689-P, Rev. 1. The revised topical reports are provided herewith in Enclosures 1 and 3, respectively.

Although some proprietary material was downgraded, WCAP-15689-P, Rev. 1 continues to contain information that is of a proprietary nature. As such, it is requested that WCAP-15689-P, Rev. 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and that copies of the topical report be appropriately safeguarded. The reasons for the classification of this information as proprietary are

delineated in the affidavit provided in Enclosure 2. Enclosure 3 provides a non-proprietary version of the topical report (i.e., WCAP-15689-NP, Revision 1).

If you have any questions regarding this matter, please do not hesitate to call Chuck Molnar of my staff at (860) 731-6286 or Chip French of our technical staff at (860) 731-6711.

Very truly yours,
Westinghouse Electric Company LLC



for Ian C. Rickard
Licensing Project Manager
Windsor Nuclear Licensing

Enclosure(s): As stated

xc: I. Ahmed (NRC, w/encl.)
G. S. Shukla (NRC, w/encl.)

Enclosure 2 to LTR-NRC-02-46

WESTINGHOUSE ELECTRIC COMPANY LLC

PROPRIETARY AFFIDAVIT FOR WCAP-15689-P, REV. 1

Proprietary Affidavit

I, Norton L. Shapiro, depose and say that I am the Consulting 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.

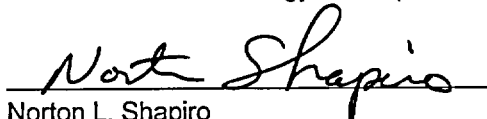
I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information. I have personal knowledge of the criteria and procedures utilized by WEC in designating information as a trade secret, privileged, or as confidential commercial 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:

WCAP-15689-P, Rev. 1, "Evaluation of Transit-Time and Cross-Correlation Ultrasonic Flow Measurement Experience With Nuclear Plant Feedwater Flow Measurement"; September, 2002

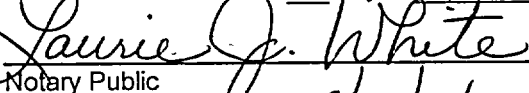
Pursuant to the provisions of Section 2.790(b)(4) of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information included in the documents listed above should be withheld from public disclosure.

- 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 the technical basis and implementation of the CROSSFLOW Ultrasonic Flow Measurement System.
- ii. The information consists of test data or other similar data for the design, development and implementation of the CROSSFLOW Ultrasonic Flow Measurement System, 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 the technical basis and implementation of the CROSSFLOW Ultrasonic Flow Measurement System, 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.



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

Sworn to before me this 12th day of September, 2002


Notary Public

My commission expires: 8/31/04

Enclosure 3 to LTR-NRC-02-46

WESTINGHOUSE ELECTRIC COMPANY LLC

WCAP-15689-NP, REV. 1

SEPTEMBER, 2002

Westinghouse Electric Company LLC

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