



Westinghouse Electric Company
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Attention: Mr. Girija Shukla

Our ref: LTR-NRC-02-47

September 12, 2002

Subject: Presentation Materials for Meeting on Westinghouse Common Qualified Platform Changes

Dear Mr. Shukla:

Provided with this letter are three copies each of proprietary and non-proprietary versions of the presentation materials for the upcoming meeting regarding changes and additions to the previous Westinghouse Common Qualified Platform submittals.

Accordingly, the following documents are enclosed:

1. One copy of the Application for Withholding, AW-02-1552 with Proprietary Information Notice and Copyright Notice
2. One copy of Affidavit, AW-02-1552

The referenced attachments contain Westinghouse proprietary information consisting of trade secrets, commercial information, and product development strategies which we consider privileged or confidential pursuant to 10 CFR 2.790. Therefore, it is requested that the Westinghouse proprietary information attached thereto be handled on a confidential basis and be withheld from public disclosures. The proprietary material in the referenced submittals is for your internal use only and may be used for the purpose for which it is submitted. It should not be otherwise used, disclosed, duplicated, or disseminated, in whole or in part, to any other person or organization outside the Commission, the Office of Nuclear Reactor Regulation, the Office of Nuclear Regulatory Research, and the necessary subcontractors that have signed a proprietary non-disclosure agreement with Westinghouse without the express written approval of Westinghouse.

YG01

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference AW-02-1552 and should be addressed to H. A. Sepp, Manager of Regulatory and Licensing, Westinghouse Electric Company, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,



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

Enclosures



Westinghouse

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Attention: Mr. Girija Shukla

Our ref: AW-02-1552

September 12, 2002

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

Reference: Letter from H. A Sepp to G. Shukla, LTR-NRC-02-47, dated September 12, 2002

Subject: Presentation Materials for Meeting on Westinghouse Common Qualified Platform Changes

Dear Mr. Shukla:

The Application for Withholding is submitted by Westinghouse Electric Company LLC ("Westinghouse"), pursuant to the provisions of paragraph (b)(1) of Section 2.790 of the Commission's regulations. It contains strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary material for which withholding is being requested is identified in the proprietary version of the subject presentation material. In conformance with 10 CFR Section 2.790, Affidavit AW-02-1552 accompanies this Application for Withholding, setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information that is proprietary to Westinghouse be withheld from public disclosure in accordance with 10CFR Section 2.790 of the Commission's regulations.

Correspondence with respect to this Application for Withholding or the accompanying Affidavit should reference AW-02-1552 and should be addressed to H. A. Sepp, Manager of Regulatory and Licensing, Westinghouse Electric Company, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,

H. A. Sepp, Manager
Regulatory and Licensing Engineering

Enclosures

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

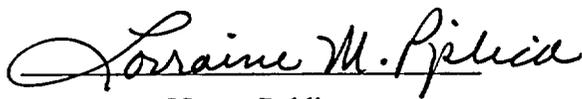
COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared H. 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:



H. A. Sepp, Manager
Regulatory and Licensing Engineering

Sworn to and subscribed
before me this 18th day
of September, 2002



Notary Public



Notarial Seal
Lorraine M. Piplica, Notary Public
Monroeville Boro, Allegheny County
My Commission Expires Dec. 14, 2003
Member, Pennsylvania Association of Notaries

- (1) I am Manager, Regulatory and Licensing Engineering, in Nuclear Services, 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 rule making proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Electric Company LLC.
- (2) I am making this Affidavit in conformance with the provisions of 10CFR 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 several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

 - (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 that 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 10CFR 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 and belief.
 - (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in the proprietary attachments for the presentation material to be used in the upcoming meeting on Westinghouse Common Qualified Platform changes.

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 evaluation justifications 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 several months of development effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, a significant manpower effort, having the requisite talent and experience, would have to be expended for developing a comparable method.

Further the deponent sayeth not.

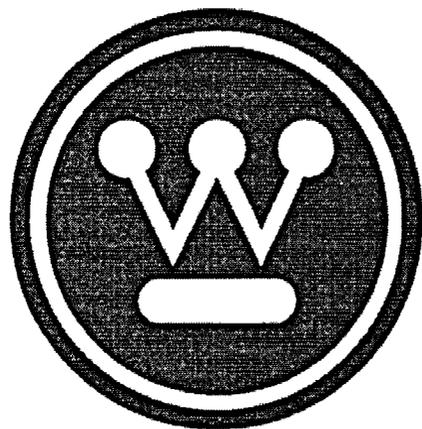
PROPRIETARY INFORMATION NOTICE

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

COPYRIGHT NOTICE

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 room in Washington, DC and in local 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.



Westinghouse

A BNFL Group company

Westinghouse Non-Proprietary Class 3

Westinghouse Common Qualified Platform

Updates to Topical Report and Appendices

October 2, 2002

Westinghouse Common Q Update - October 2002

Reasons for Update

- Changes to a few hardware modules
- Changes to the architecture of CPC and PAMS
- Clarification of the software development process
- Completion of equipment qualification and addition of a equipment qualification summary report

Westinghouse Common Q Update - October 2002

Hardware Module Changes

- Replacement of PM646 with PM646A processor module

–[

]a,c

- [

]a,c

Westinghouse Common Q Update - October 2002

Hardware Module Changes - (continued)

- Development of AI685 Module
 - [

]a,c

Westinghouse Common Q Update - October 2002

PAMS Application Changes

- The power supply configuration has been finalized based on final Common Q power supply designs
- CI631 communications interface []^{a,c}
- Various other minor architecture changes

Westinghouse Common Q Update - October 2002

CPC Application Changes - Existing Configuration

- [

]a,c

Westinghouse Common Q Update - October 2002

CPC Application Changes - Revised Configuration

- [

]a,c

- Various other minor architecture changes

Westinghouse Common Q Update - October 2002

Software Program Manual

- Clarification of documentation requirements for various categories of software
- Clarification of various responsibilities related to software development process tasks
- Clarification of V&V inputs and outputs
- Various other minor clarifications

Westinghouse Common Q Update - October 2002

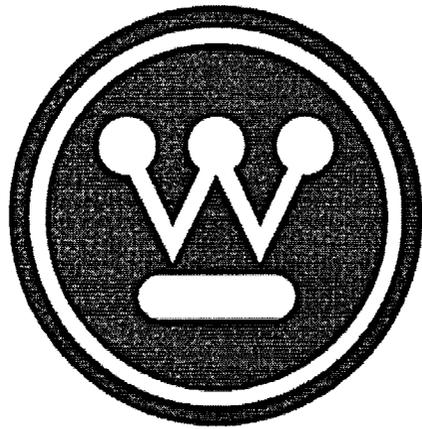
Equipment Qualification Program

- EQ (seismic, environmental and EMI) complete for all Common Q modules, sub-assemblies and cabinets
- Provides qualification baseline for each piece by type, model, etc to address future hardware changes or technical issues
- Provides qualification levels for seismic, environmental and EMI
- [
]a,b,d
- Identifies all installation limitations required to support EMI qualification

Westinghouse Common Q Update - October 2002

Equipment Qualification Program (Continued)

- Information presented for closing Generic Open Items
 - 7.1 - Qualification of new or redesigned I/O modules (A1685)
 - 7.2 - Qualification of Common Q power supplies
 - 7.3 - Qualification of the watchdog timer []^{a,c}
 - 7.5 - EMC testing of the PM646 processor (actually PM646A)
 - 7.6 - Non-A160 hardware components: FPDS, watchdog timer and power supplies.
FPDS and power supplies fully qualified. []^{a,c}



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