

CEOG COMBUSTION ENGINEERING OWNERS GROUP

Westinghouse Electric Company LLC	Calvert Cliffs Nuclear Power Plant, Inc. Calvert Cliffs 1, 2	Entergy Operations, Inc. ANO 2	Korea Hydro & Nuclear Power Company WSES Unit 3	YGN 3, 4	Ulchin 3,4	Omaha Public Power District Ft. Calhoun
Arizona Public Service Co. Palo Verde 1, 2, 3	Consumers Energy Co. Palisades	Florida Power & Light Co. St. Lucie 1, 2	Dominion Nuclear Connecticut, Inc. Millstone 2	Southern California Edison SONGS 2,3		

January 21, 2003

WOG-03-28

Project No. 692

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

ATTN: Chief, Information Management Branch
Division of Program Management

Subject: **Transmittal of CE Owners Group Reports, "Generic Assessment Plan" WCAP-15956-P, Rev. 0 and WCAP-15956-NP, Rev. 0, October 2002 (Proprietary and Non-Proprietary Versions) and**

"Auxiliary Feedwater System Safety System Functional Assessment, Palo Verde Nuclear Generating Station Units 1, 2 and 3", WCAP-15907-P, Rev. 1 and WCAP-15907-NP, Rev. 1, August 2002 (Proprietary and Non-Proprietary Versions)

In order to support future WOG/CEOG efforts to secure regulatory inspection credit for Licensee Self-Assessments (LSAs), Westinghouse is providing the following reports to the NRC solely **FOR INFORMATION ONLY** and does not seek formal review of these reports at this time:

- " WCAP-15956-P and WCAP-15956-NP, Rev. 0, "Generic Assessment Plan"
- " WCAP-15907-P and WCAP-15907-NP, Rev. 1, "Auxiliary Feedwater System Safety System Functional Assessment, Palo Verde Nuclear Generating Station Units 1, 2 and 3",

Westinghouse has generated Non-Proprietary versions of the following documents to accompany the Proprietary versions. An affidavit is also enclosed.

WCAP-15956-P and NP, Rev. 0, "Generic Assessment Plan", is currently used by the CEOG Resource Sharing Subcommittee to perform self-assessments for participating CEOG members. WCAP-15907-P and NP, Rev. 1, summarizes results of the Palo Verde Nuclear Generating Station Auxiliary Feedwater System assessment held in June 2002 and is provided as a sample of the product of an assessment performed in accordance with WCAP-15956-P and NP.

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Information contained in WCAP-15956-P, Rev. 0 and WCAP-15907-P, Rev. 1 has been determined by Westinghouse to be proprietary in nature. It is requested that this information be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and be appropriately safeguarded. The reasons for the classification of this information as proprietary are delineated in the enclosed affidavit. If you have any questions, please do not hesitate to contact me at 410-495-4724 or Mr. Gordon Bischoff, Manager, Owners Groups Program Management Office at 860-731-6200.

Sincerely,



Gary S. Pavis, Chairman
CE Owners Group

Enclosure: Proprietary Affidavit
WCAP-15956-P, Rev. 0
WCAP-15956-NP, Rev. 0
WCAP-15907-P, Rev. 1
WCAP-15907-NP, Rev. 1

cc: CEOG Management Committee
CEOG Licensing Subcommittee Representatives
G. S. Pavis, CEG
G. S. Shukla, USNRC OWFN 07-E1 (1L, 1E, 4R) via Federal Express
J. Jacobsen, USNRC (1L, 1E)
H. A. Sepp, Westinghouse
G. C. Bischoff, Westinghouse
J. P. Molkenthin, Westinghouse
G. F. Forte, Westinghouse
F. P. Ferraraccio, Westinghouse
K. J. Vavrek, Westinghouse
V. Paggen, Westinghouse (1L, 1E, 4R)
M. Winsor, APS
D. Bernier, APS
CEOG Library Task 2031

Enclosure 1
Proprietary Affidavit

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 conjunction with the application by Arizona Public Service Company and 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.

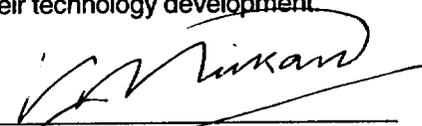
The information for which proprietary treatment is sought, and which documents have been appropriately designated as proprietary, is contained in the following:

WCAP-15956-P, Rev. 0, "Safety System Functional Assessment (SSFA) Generic Assessment Plan", October, 2002

WCAP-15907-P, Rev. 1, "Auxiliary Feedwater System Safety System Functional Assessment Palo Verde Nuclear Generating Station Units 1, 2 and 3", August, 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 strategies for the performance of SSFAs as well as plant specific component identifiers from SSFA results.
- ii. The information consists of test data or other similar data for the design, development and implementation of strategies for the performance of SSFAs as well as plant specific component identifiers from SSFA results, 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 strategies for the performance of SSFAs as well as plant specific component identifiers from SSFA results, 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 15th day of January, 2003



Notary Public
My commission expires: 8/31/04

Report 1

WCAP-15956-P, Rev. 0