



Domestic Members

- AmerenUE
- Callaway
- American Electric Power Co.
D.C. Cook 1 & 2
- Arizona Public Service Co.
Palo Verde 1, 2 & 3
- Constellation Energy Group
Calvert Cliffs 1 & 2
- Dominion Nuclear Connecticut
Millstone 2 & 3
- Dominion Virginia Power
North Anna 1 & 2
Surry 1 & 2
- Duke Energy
Catawba 1 & 2
McGuire 1 & 2
- Entergy Nuclear Northeast
Indian Point 2 & 3
- Entergy Nuclear South
ANO 2
Waterford 3
- Exelon Generation Company LLC
Braidwood 1 & 2
Byron 1 & 2
- FirstEnergy Nuclear Operating Co.
Beaver Valley 1 & 2
- FPL Group
St. Lucie 1 & 2
Seabrook
Turkey Point 3 & 4
- Nuclear Management Co.
Kewaunee
Palisades
Point Beach 1 & 2
Prairie Island
- Omaha Public Power District
Fort Calhoun
- Pacific Gas & Electric Co.
Diablo Canyon 1 & 2
- Progress Energy
H. B. Robinson 2
Shearon Harris
- PSEG – Nuclear
Salem 1 & 2
- Rochester Gas & Electric Co.
R. E. Ginna
- South Carolina Electric & Gas Co.
V. C. Summer
- Southern California Edison
SONGS 2 & 3
- 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
- Electricité de France
Kansai Electric Power Co.
Mihama 1
Takahama 1
Ohi 1 & 2
- Korea Hydro & Nuclear Power Co.
Kori 1 – 4
Uchin 3 & 4
Yonggwang 1 - 5
- British Energy plc
Sizewell B
- NEK
Krško
- Spanish Utilities
Asco 1 & 2
Vandellós 2
Almaraz 1 & 2
- Ringhals AB
Ringhals 2 – 4
- Taiwan Power Co.
Maanshan 1 & 2

WCAP-15996-P-A, Rev. 0, Vols. 1-4
WCAP-15996-NP-A, Rev. 0, Vols. 1-4
Project Number 694

June 3, 2004

WOG-04-303

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

Attention: Chief, Information Management Branch,
Division of Program Management

Subject: Westinghouse Owners Group
Transmittal of Approved Topical Report: WCAP-15996-P-A, Revision 0, Vols. 1-4 (Proprietary) and WCAP-15996-NP-A, Revision 0, Vols. 1-4 (Non-Proprietary), “Technical Description Manual for the CENTS Code” (TAC NO. MB6982) (CEOG Tasks 2061/2077)

Reference: 1. Letter, H.N. Berkow (USNRC) to G. Bischoff (Westinghouse), “Final Safety Evaluation for the Topical Report WCAP-15996-P, “Technical Description Manual for the CENTS Code”” (TAC NO. MB6982) dated December 1, 2003.

In accordance with the Nuclear Regulatory Commission (NRC) Safety Evaluation (Reference 1), the Westinghouse Owners Group (WOG) is providing four copies of WCAP-15996-P-A, Rev. 0, Vols. 1-4 (Proprietary) and two copies of WCAP-15996-NP-A, Rev. 0, Vols. 1-4 (Non-Proprietary), “Technical Description Manual for the CENTS Code”, prepared by Westinghouse Electric Company LLC (Westinghouse) for the WOG. These documents incorporate the NRC SER and are acceptable for referencing as an approved methodology in plant licensing applications.

It should be noted that this topical report carries a dual report identifier; that is, WCAP-15996-P-A, Rev. 0 (WCAP-15996-NP-A, Rev. 0) and CENPD-288-P-A, Rev. 1 (CENPD-288-NP-A, Rev. 1). The purpose of this dual identifier is to preclude licensees already using the previous CENPD report identifier from having to change Technical Specification COLR references to the Westinghouse WCAP report identifier system.

D048

Also enclosed are:

1. One (1) copy of the Application of Withholding Proprietary Information from Public Disclosure, CAW-04-1843 (Non-Proprietary).
2. One (1) copy of Affidavit CAW-04-1843 (Non-Proprietary).

As this report, WCAP-15996-P-A, Rev. 0 and CENPD-288-P-A, Rev. 1, 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 2.390 of the Commission's regulations. Accordingly, it is respectively requested that the proprietary information be withheld from public disclosure in accordance with 10CFR Section 2.390 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-04-1843, as appropriate, and should be addressed to Mr. James A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company, P. O. Box 355, Pittsburgh, PA 15230-0355.

If you have questions regarding this submittal, feel free to contact Mr. Steve DiTommaso in the Owners Group Program Management Office at 412-374-5217.

Sincerely,



Frederick P. "Ted" Schiffley, II, Chairman
Westinghouse Owners Group

Enclosures

cc: G.S. Shukla, NRC w/enclosures (1L, 3P, 1NP, 1 affidavit) (via FedEx)
S. Dembek, NRC
Management Committee
Project Management Office
G.C. Bischoff, Westinghouse
J.P. Molkenthin, Westinghouse
C.M. Molnar, Westinghouse
S.P. Rigby, Westinghouse
Analysis Subcommittee
C.B. Brinkman, Westinghouse
J.A. Gresham, Westinghouse
M.C. Janke, Westinghouse
V.A. Paggen, Westinghouse
E.J. Schulz, Westinghouse

Westinghouse Electric Company LLC

WCAP-15996-P-A, Rev. 0, Vols. 1-4

CENPD-288-P-A, Rev. 1, Vols. 1-4

Technical Description Manual for the CENTS Code

April 2004

Westinghouse Electric Company LLC

**WCAP-15996-NP-A, Rev. 0, Vols. 1-4
CENPD-288-NP-A, Rev. 1, Vols. 1-4
Technical Description Manual for the CENTS Code**

April 2004

Westinghouse Electric Company LLC

Proprietary Affidavit CAW-04-1843

for

WCAP-15996-P-A, Rev. 0, Vols. 1-4

CENPD-288-P-A, Rev. 1, Vols. 1-4

Technical Description Manual for the CENTS Code



Westinghouse Electric Company
Nuclear Services
P.O. Box 355
Pittsburgh, Pennsylvania 15230-0355
USA

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

Direct tel: (412) 374-4643
Direct fax: (412) 374-4011
e-mail: greshaja@westinghouse.com

Our ref: CAW-04-1843

June 3, 2004

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

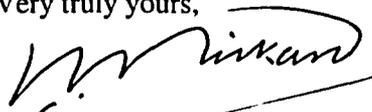
Subject: WCAP-15996-P-A, Rev. 0, Vols. 1-4, "Technical Description Manual for the CENTS Code"
(Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-04-1843 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 2.390 of the Commission's regulations.

Accordingly, this letter authorizes use 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-04-1843, and should be addressed to J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,


for J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

Enclosures

- (1) I am the Licensing Project Manager, 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 Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 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 Westinghouse 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 2.390 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 10 CFR Section 2.390, 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 Enclosure 1-P to Letter, T. F. Schiffley (WOG) to U.S. NRC Document Control Desk, "Transmittal of Approved Topical Report: WCAP-15996-P-A, Revision 0, Vols. 1-4 (Proprietary) and WCAP-15996-NP-A, Revision 0, Vols. 1-4 (Non-Proprietary), 'Technical Description Manual for the CENTS Code,'" WOG-04-303, dated June 3, 2004, being transmitted by the Westinghouse Owners Group letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted for use by Westinghouse for the Westinghouse Owners Group is expected to be applicable for other licensee submittals in response to certain NRC requirements for justification of use of the CENTS code.

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

- (a) Perform UFSAR Chapter 15 safety analyses using the CENTS code.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purposes of performing UFSAR Chapter 15 safety analyses with the CENTS code.
- (b) Westinghouse can sell support and defense of UFSAR Chapter 15 safety analyses using the CENTS code.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

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 products 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.

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 2.390 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 2.390(b)(1).

COPYRIGHT NOTICE

The information transmitted herewith bears 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 approval 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 2.390 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 version of this report, 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.