

July 1, 2005

NRC 2005-0084
10 CFR 50.55a(g)(5)(iii)

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

Point Beach Nuclear Plant, Unit 1
Docket 50-266
License No. DPR-24

Reactor Vessel Closure Head Penetration Flaw Characterization Relief Request
MR 02-018-2, Revision 2

References: (1) NRC Safety Evaluation dated September 10, 2003
(2) NRC Safety Evaluation dated July 16, 2004
(3) Letter from NMC to NRC, "Reactor Vessel Closure Head Penetration Repair Relief Requests MR 02-018-01 and MR 02-018-02," dated August 28, 2002 (NRC 2002-0073)

Pursuant to 10 CFR 50.55a(g)(5)(iii), Nuclear Management Company (NMC) LLC, the licensee for Point Beach Nuclear Plant (PBNP), requests a change to the NRC Safety Evaluation dated July 16, 2004 (Reference 2), pertaining to the Unit 1 reactor vessel closure head (RVCH) penetration flaw characterization. Revision 2 of Relief Request MR 02-018-2 is requested specifically to correct an error in the reactor pressure vessel upper head operating temperature, which was an input to the crack growth propagation analysis. Unit 1 is currently operating under the alternative authorized in Reference 2.

Relief Request MR 02-018-2 (Revision 0) requested an alternative from the requirement to characterize flaws that could exist in the remnants of the control rod drive mechanism nozzle J-groove welds after a repair. In the NRC Safety Evaluation (Reference 1) for this relief request, the staff limited approval to only cases where there was no overlap of the new Alloy 52 weld material onto any portion of the remnant J-groove weld. The NRC Safety Evaluation (Reference 2) for Revision 1 of Relief Request MR 02-018-2 removed this restriction and allowed an overlap of Alloy 52 weld material on the remnant J-groove weld for the duration of the current cycle, or 1.5 effective full power years (EFPY).

A reactor pressure vessel upper head operating temperature of 592°F was used as an input into the Primary Water Stress Corrosion Cracking (PWSCC) crack growth propagation analyses that provided justification for the proposed alternative. Subsequent to receipt of Reference 2, it was identified that the fluid temperature in the upper head region is 593.9°F, slightly higher than the value of 592°F used in the

analysis. Because an increase in the upper head temperature will increase the crack propagation rates used in the analysis, NMC is submitting Revision 2 of Relief Request MR 02-018-2 and supporting analysis, to address this change in upper head temperature.

Enclosure 1 provides the revised relief request, including technical justification.

Enclosure 2 provides a Westinghouse Electric Company LLC letter (proprietary) that summarizes the analysis performed to determine the updated head temperature. Also provided in Enclosure 2 is Westinghouse authorization letter CAW-05-2011, accompanying affidavit, Proprietary Information Notice and Copyright Notice.

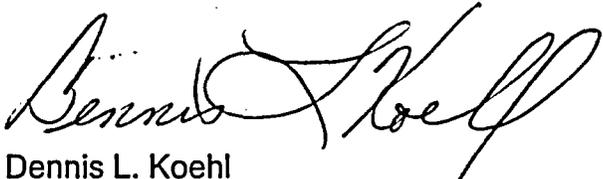
Enclosure 3 provides a revised PWSCC analysis using the updated head temperature.

Enclosure 2 contains information proprietary to Westinghouse Electric Company LLC, therefore, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit 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 Section 2.390 of the Commission's regulations. Accordingly, it is requested that this proprietary information be withheld from public disclosure in accordance with 10 CFR 2.390.

Correspondence with respect to the copyright or proprietary aspects of the above documents, or the supporting Westinghouse affidavit, should reference the appropriate authorization letter (CAW-05-2011) and be addressed to J. A. Gresham, Manager of Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

NMC has reviewed the revised relief request against the requirements of "Issuance of First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors", as relaxed by the June 4, 2004, NRC letter, "Relaxation of The Requirements of First Revised Order (EA-03-009) Regarding Reactor Pressure Vessel Head Inspections Dated February 20, 2004". Compliance with the Order requirements is not affected by the revised relief request.

This submittal contains no new or revised regulatory commitments.



Dennis L. Koehl
Site Vice-President, Point Beach Nuclear Plant
Nuclear Management Company, LLC

Document Control Desk
Page 3

Enclosures 1 - Request for Revised Relief MR 02-018-2
2 - Westinghouse Letter WEP-05-168, Revision 1, dated June 20, 2005
3 - Structural Integrity Associates Calculation PBCH-09Q-302, Revision 3

cc: Regional Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
PSCW

ENCLOSURE 1

REQUEST FOR REVISED RELIEF MR 02-018-2 POINT BEACH NUCLEAR PLANT, UNIT 1

Relief Request No. MR 02-018-2, Revision 2, Characterization of Remaining Flaws – Reactor Vessel Closure Head Penetrations

Pursuant to 10 CFR 50.55a(g)(5)(iii), NMC requests revision to the relief, granted in NRC Safety Evaluation dated July 16, 2004 (Reference 2), pertaining to ASME XI IWA-3300(b), IWB-3142.4 and IWB-3420, which would require characterization of a flaw existing in the remnant of the J-groove weld that will be left on the Point Beach Unit 1 Reactor Vessel Closure Head (RVCH) if a Control Rod Drive (CRDM) nozzle must be partially removed. The July 16, 2004, NRC Safety Evaluation extended the relief granted previously by NRC Safety Evaluation dated September 10, 2003 (Reference 1), such that it applies to situations where the portions of the pressure boundary weld overlap onto portions of the remnant J-groove weld.

This revision is submitted specifically to correct an error in the reactor pressure vessel upper head operating temperature that is used as an input to the crack growth propagation analysis. Unit 1 is currently operating under the relief granted in Reference 2.

The Primary Water Stress Corrosion Cracking (PWSCC) analyses were performed to provide a justification for the NRC Safety Evaluation dated July 16, 2004 (Reference 2). These analyses utilized an upper head temperature of 592°F. Recent analysis of the upper head fluid conditions for the current Unit 1 operating cycle has shown this temperature to be 593.9°F. This higher temperature slightly reduces the calculated repair life prediction based on the PWSCC analyses.

IDENTIFICATION

Point Beach Unit 1
RVCH Penetrations, Class A (Class 1)

CODE REQUIREMENT

As stated in the original relief request dated August 28, 2002 (Reference 3), and restated here:

Point Beach Unit 1 is currently in the fourth inspection interval using the 1998 Edition of ASME Section XI with all addenda through 2000. IWB-2500, Examination Category B-P, "All Pressure Retaining Components," Item B15.10, is applicable to the inservice examination of the RVCH to penetration welds. IWA-3300, IWB-3142.4, IWB-3420, are applicable to any flaws discovered during inservice inspection.

Specifically:

1. Subarticle IWA-3300(b) contains a requirement for flaw characterization.
2. Sub-subparagraph IWB-3142.4 allows for analytical evaluation to demonstrate that a component is acceptable for continued service. It also requires that components found acceptable for continued service by analytical evaluation be subsequently examined in accordance with IWB-2420(b) and (c).
3. Paragraph IWB-3420 requires the characterization of flaws in accordance with the rules of IWA-3300.

The Construction Code for the Point Beach Unit 1 RVCH is ASME Section III, 1965 Edition.

REVISED RELIEF REQUESTED

As stated in the original relief request dated August 28, 2002 (Reference 3), and restated here:

NMC requests revised relief, for situations where the portions of the nozzle 26 pressure boundary weld overlap onto portions of the remnant J-groove weld, from ASME XI IWA-3300(b), IWB-3142.4 and IWB-3420, which would have required characterization of a flaw existing in the remnant of the J-groove weld that was left on the Point Beach Unit 1 RVCH.

BASIS FOR REVISED RELIEF

The basis for the original relief request dated August 28, 2002 (Reference 3), remains applicable to this request for revised relief and is restated here:

Any indications found during inspection of the RVCH CRDM nozzle penetrations that affected the J-groove attachment welds, such as was found in penetration #26, would have been impractical to characterize by NDE. The original CRDM nozzle to RVCH weld configuration was extremely difficult to UT due to the compound curvature and fillet radius. The configuration was not conducive to UT due to the configuration and dissimilar metal interface between the NiCrFe weld and the low alloy steel RVCH. Furthermore, due to limited accessibility from the RVCH outer surface and the proximity of adjacent nozzle penetrations, it was impractical to scan from the outer surface on the RVCH base material to detect flaws in the vicinity of the original weld. These conditions precluded ultrasonic coupling and control of the sound beam in order to perform flaw sizing with reasonable confidence in the measured flaw dimension. Therefore it was impractical to characterize such flaw geometries.

A repair on the uphill side of penetrations in the outer ring of the RVCH, such as penetration #26, could not have been physically performed without overlapping the new

pressure boundary weld onto portions of the remnant J-groove weld due to the high curvature of the RVCH in this area. Westinghouse 2-loop plants, such as PBNP, have a higher head curvature than most plants due to the smaller reactor vessel diameter.

During the Unit 1 spring 2004 refueling outage, an ultrasonic (UT) signal was detected at the weld root downhill location (180°) of penetration #26. This signal was attributed to a fabrication weld repair performed during construction of the vessel head. Several confirmatory liquid penetrant tests (PT) revealed J-groove surface indications at the 90° and 270° locations of Nozzle 26. A decision was conservatively made to repair this nozzle due to the high radiation doses involved with flaw excavation. Owing to the steep curvature of the RVCH, the Alloy 52 repair weld came into contact with the existing Alloy 182 J-groove weld.

NMC determined that the weld overlap was structurally acceptable. As a contingency, NMC had prepared an alternate repair design that included separation of the weld overlap via grinding. This option was considered, but determined to not be appropriate due to the high radiation doses to personnel that would be incurred during such an activity.

The effort to grind away the overlap on Nozzle 26, by removing the new weld material from the remnant J-groove weld, would have been significant. The grinding process would also have decreased the structural strength of the nozzle attachment weld. The most significant concern was the high radiation dose that would have been incurred during this activity. The dose estimates for this grinding process are outlined below.

The total dose estimate associated with the grinding evolution would have been approximately 15 Rem. Removal of the weld overlap via grinding would have presented an undue hardship due to the high radiation doses to personnel that would be incurred during such an activity. Welding on the nozzle was performed using a precision machine welder, resulting in a high quality weld. Grinding the weld would need to have been performed manually, by multiple technicians (to limit individual dose). Because the weld overlap was determined to be structurally acceptable, separating the weld overlap via grinding would not produce a compensating increase in the level of quality or safety of the nozzle's structural integrity. To verify a flaw-free surface for weld application, the machined inside diameter (ID) surface of the original J-groove weld, in the area that the new Alloy 52 weld overlaps, was inspected by PT and ultrasonic testing (UT) prior to welding. These inspections detected no flaws or indications on the surface or in the volume of the J-groove weld.

ALTERNATIVE DOCUMENTATION AND REQUIREMENTS

The alternatives stated in the original relief request dated August 28, 2002 (Reference 3), remain applicable to this request for revised relief and are restated here:

1. Subarticle IWA-3300(b) contains a requirement for flaw characterization. In lieu of this requirement, a conservative worst-case flaw shall be assumed to exist in

this weld that extends from the surface of the weld to the RVCH low alloy steel base material interface. Crack growth analysis will be performed based on that flaw to establish the minimum remaining service life of the RVCH.

2. Subparagraph IWB-3142.4 allows for analytical evaluation to demonstrate that a component is acceptable for continued service. It also requires that components, found acceptable for continued service by analytical evaluation, be subject to successive examination. Since it is impractical to perform a subsequent inspection, that would be able to characterize any remaining flaws, successive examination will not be performed during the evaluated service time period. Replacement of the affected RVCH and CRDM penetration(s) will occur prior to exceeding the remaining service life corresponding to a postulated worst-case flaw.
3. Paragraph IWB-3420 requires the characterization of flaws in accordance with the rules of IWA-3300. As previously stated, a conservative worst-case flaw shall be assumed to exist and appropriate crack growth analysis will be performed based on that flaw.

JUSTIFICATION FOR REVISED RELIEF

The justification stated in the original relief request dated August 28, 2002 (Reference 3), remains applicable to this request for revised relief.

The evaluation of the repair of Unit 1 RVCH penetration #26 included measurement of the Alloy 52 to Alloy 82/182 overlap and weld ligament dimensions. The weld ligament was found to be 0.5-inch. The weld ligament is defined as the portion of the new Alloy 52 pressure boundary weld that is not overlapping with the original J-groove weld (Alloy 82/182). Refer to Figure 1 below.

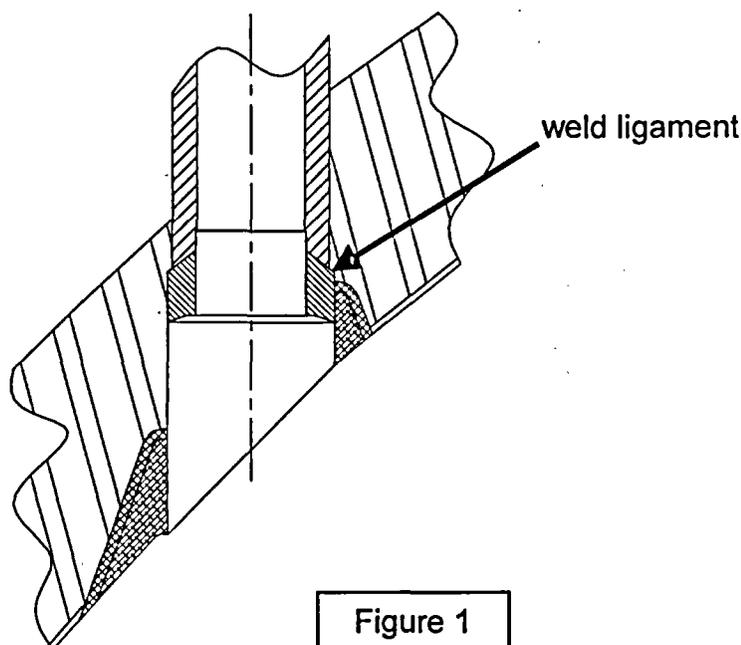


Figure 1

This measurement was performed to support analysis of a worst-case flaw in the existing Alloy 82/182 material that grows through the Heat Affected Zone (HAZ) of the new Alloy 52 pressure boundary weld. Although not detected in the post-welding NDE processes, the analysis also conservatively assumed the existence of a 0.1-inch root defect in the new Alloy 52 pressure boundary weld. This assumption reduces the assumed weld ligament from 0.5-inch to 0.4-inch.

Calculations using Alloy 82/182 crack growth rates contained in Structural Integrity Associates (SIA) calculation PBCH-09Q-302, Revision 2, showed that it would take 1.39 EFPY for a flaw located at the weld/head interface to propagate through the Alloy 52 weld, using a RVCH temperature of 592°F. Crack growth rates in Alloy 52 material are very low. Reference 2 concluded that use of the Alloy 82/182 crack growth rate is a conservative representation for Alloy 52, since published information indicates that the crack growth rates are five to six times higher in Alloy 82 welds than in Alloy 600 nozzle materials.

The NRC Safety Evaluation, dated July 16, 2004 (Reference 2), recognized that the 1.39 EFPY estimate may be less than remaining amount of time the plant may operate before retiring the RVCH from service. NMC will be replacing the Unit 1 RVCH at the end of the current operating cycle. NRC staff considered the conservative assumptions used in the analysis and concluded that it would take in excess of 1.5 EFPY for a flaw to propagate through the J-groove weld with an overlap condition.

A summary (Enclosure 2) of the recently revised analysis of the upper head fluid conditions has determined that the temperature is slightly higher at 593.9°F vice 592°F. Calculations show that it would take 1.31 EFPY, for a flaw located at the weld/head interface, to propagate through the Alloy 52 weld using the updated RVCH temperature of 593.9°F. This analysis conservatively used Alloy 82/182 crack growth rates and included an assumed 0.1-inch root defect. This PWSCC repair life analysis is contained in SIA calculation PBCH-09Q-302, Revision 3, provided in Enclosure 3.

As concluded in the July 16, 2004, Safety Evaluation (Reference 2), the conservative assumptions in the PWSCC calculations indicate that an actual flaw would require more time than the predicted EFPY to grow through the J-groove weld. Based on the analytical information provided in the revised calculations, the short time of operation (<1.5 EFPY) prior to removal of the RVCH from service, and with the conservative assumptions made in the calculation, NMC requests that the approval previously granted in Reference 2 to operate Unit 1 for 1.5 EFPY (for the remainder of the current operating cycle) continue to be considered valid. Due to operational constraints (e.g., fuel loading), Unit 1 is not expected to accumulate greater than 1.41 EFPY prior to shutdown.

IMPLEMENTATION SCHEDULE

The revised relief requested applies to Unit 1 for the remainder of the current operating cycle. This cycle will end with a refueling outage currently scheduled for fall 2005. NMC will replace the Unit 1 RVCH during the fall 2005 outage.

ENCLOSURE 2

**WESTINGHOUSE LETTER WEP-05-168
"POINT BEACH UNIT 1, CYCLE 29 – REACTOR VESSEL
UPPER CLOSURE HEAD VOLUME BEST-ESTIMATE MEAN FLUID TEMPERATURE "
REVISION 1
DATED JUNE 20, 2005**

PROPRIETARY

**WESTINGHOUSE AUTHORIZATION LETTER
AFFIDAVIT
PROPRIETARY INFORMATION NOTICE
COPYRIGHT NOTICE**

(10 pages follow)



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Our ref: CAW-05-2011

June 20, 2005

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

Subject: WEP-05-168, Rev. 1, "Point Beach Unit 1, Cycle 29 – Reactor Vessel Upper Closure Head Volume Best-Estimate Mean Fluid Temperature," dated June 20, 2005 (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-05-2011 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 the utilization of the accompanying affidavit by Nuclear Management Company.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-05-2011, 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,

A handwritten signature in black ink, appearing to read 'J. A. Gresham', written over a horizontal line.

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

Enclosures

cc: B. Benney
L. Feizollahi

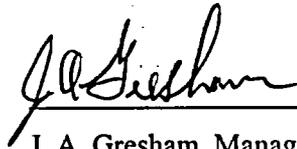
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared J. A. Gresham, 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:



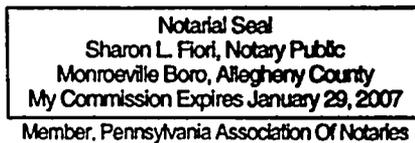
J. A. Gresham, Manager

Regulatory Compliance and Plant Licensing

Sworn to and subscribed
before me this 20th day
of June, 2005



Notary Public



- (1) I am Manager, Regulatory Compliance and Plant Licensing, 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 WEP-05-168, Rev. 1, "Point Beach Unit 1, Cycle 29 – Reactor Vessel Upper Closure Head Volume Best-Estimate Mean Fluid Temperature" (Proprietary), dated June 20, 2005. The information is provided in support of a submittal to the Commission, being transmitted by Nuclear Management Company 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 Point Beach Unit 2 contains design information that is proprietary to Westinghouse and is provided in response to certain NRC requirements for justification of reactor vessel head drop analyses.

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

- (a) Show that a postulated drop of the replacement reactor vessel closure head would produce impact forces at the vessel supports that are no greater than those calculated for the original vessel head, accounting for the different weights of new replacement reactor vessel head and head assembly upgrade packages.
- (b) Assist the customer to obtain NRC approval.

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 meeting NRC requirements for licensing documentation.
- (b) Westinghouse can sell support and defense of this information 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 licensing support documentation 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).

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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 2.390 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 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.