



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

U.S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, D.C. 20555

Direct tel: 412-374-6306
Direct fax: 412-374-5005
e-mail: sterdia@westinghouse.com

Your ref: Project Number 740
Our ref: DCP/NRC1802

November 17, 2006

Subject: AP1000 COL Standard Technical Report Submittal of APP-GW-GLN-016, Revision 0

In support of Combined License application pre-application activities Westinghouse is submitting AP1000 Standard Combined License Technical Report Number 34. This report identifies and justifies standard changes to the AP1000 Design Control Document (DCD). These changes are related to changes to the reactor coolant pump. The changes to the DCD identified in Technical Report 34 are intended to be incorporated into FSARs referencing the AP1000 Design Certification or incorporated into the design certification by an amendment to the design certification. This report is submitted as part of the NuStart Bellefonte COL Project (NRC Project Number 740). The information included in this report is generic and is expected to apply to all COL applications referencing the AP1000 Design Certification.

The purpose for submittal of this report was explained in a March 8, 2006 letter from NuStart to the NRC.

Pursuant to 10 CFR 50.30(b), APP-GW-GLN-016, Revision 0, "AP1000 Licensing Design Change Document for Generic Reactor Coolant Pump," (Technical Report Number 34), is submitted as Enclosure 1 under the attached Oath of Affirmation.

It is expected that when the NRC review of Technical Report Number 34 is complete, the changes to the DCD identified in Technical Report 34, will be considered approved generically for COL applicants referencing the AP1000 Design Certification.

Also enclosed is one copy each of AP1000 RCP-06-009-P, "Structural Analysis Summary for the AP1000 Reactor Coolant Pump High Inertia Flywheel," (proprietary) October 19, 2006 and AP1000 RCP-06-009-NP, "Structural Analysis Summary for the AP1000 Reactor Coolant Pump High Inertia Flywheel," (non-proprietary) October 19, 2006 and one copy of the Application for Withholding, AW-06-2112 (non-proprietary) with Proprietary Information Notice, and one copy of the associated Affidavit (non-proprietary).

This submittal contains proprietary information of Curtiss Wright Electro-Mechanical Corporation. In conformance with the requirements of 10CFR Section 2.390, as amended, of the Commission's regulations, we are enclosing with this submittal an Application for Withholding from Public Disclosure and an affidavit. The affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission. Correspondence with respect to this Application

for Withholding or the accompanying affidavit should reference AW EMD06-001 and should be addressed to Annette Bohinski, Manager of Marketing and Contracts, Curtiss-Wright Electro-Mechanical Corporation, 1000 Cheswick Avenue, Cheswick, Pennsylvania, 15024.

Westinghouse is hereby requesting review and approval of the design changes associated with the CRDM Design completion.

Questions or requests for additional information related to content and preparation of this report should be directed to Westinghouse. Please send copies of such questions or requests for additional information to the prospective applicants for combined licenses referencing the AP1000 Design Certification. A representative for each applicant is included on the cc: list of this letter.

Very truly yours,



A. Sterdis, Manager
Licensing and Customer Interface
Regulatory Affairs and Standardization

/Attachment

1. "Oath of Affirmation," dated November 17, 2006

/Enclosures

1. Application for Withholding Proprietary from Disclosure," dated November 15, 2006
2. AW-06-2112, Affidavit, Proprietary Information from Disclosure," date November 15, 2006
3. APP-GW-GLN-016, Revision 0, "AP1000 Licensing Design Change Document for Generic Reactor Coolant Pump," Technical Report Number 34
4. AP1000 RCP-06-009-P, "Structural Analysis Summary for the AP1000 Reactor Coolant Pump High Inertia Flywheel," (proprietary) October 19, 2006
5. AP1000 RCP-06-009-NP, "Structural Analysis Summary for the AP1000 Reactor Coolant Pump High Inertia Flywheel," (non-proprietary) October 19, 2006

cc:	S. Bloom	- U.S. NRC	1E	1A
	S. Coffin	- U.S. NRC	1E	1A
	G. Curtis	- TVA	1E	1A
	P. Grendys	- Westinghouse	1E	1A
	P. Hastings	- Duke Power	1E	1A
	C. Ionescu	- Progress Energy	1E	1A
	D. Lindgren	- Westinghouse	1E	1A
	A. Monroe	- SCANA	1E	1A

M. Moran	- Florida Power & Light	1E	1A
C. Pierce	- Southern Company	1E	1A
E. Schmiech	- Westinghouse	1E	1A
G. Zinke	- NuStart/Entergy	1E	1A

ATTACHMENT 1

“Oath of Affirmation”

ATTACHMENT 1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of:)
NuStart Bellefonte COL Project)
NRC Project Number 740)

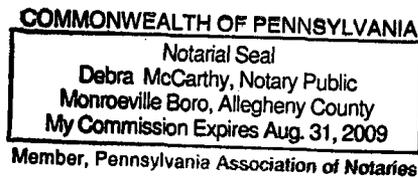
APPLICATION FOR REVIEW OF
"AP1000 GENERAL COMBINED LICENSE INFORMATION"
FOR COL APPLICATION PRE-APPLICATION REVIEW

W. E. Cummins, being duly sworn, states that he is Vice President, Regulatory Affairs & Standardization, for Westinghouse Electric Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission this document; that all statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.



W. E. Cummins
Vice President
Regulatory Affairs & Standardization

Subscribed and sworn to
before me this 17th day
of November 2006.



Notary

ENCLOSURE 1

APPLICATION FOR WITHHOLDING
PROPRIETARY INFORMATION FROM DISCLOSURE

November 15, 2006



EMD

Curtiss-Wright
Electro-Mechanical Corporation
1000 Cheswick Avenue
Cheswick, Pennsylvania
15024-1300

U.S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, D.C. 20555

Letter No.: AW-06-112
November 15, 2006

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

Subject: Transmittal of Proprietary and Non-Proprietary Information, AP1000RCP-06-009. "Structural Analysis Summary for the AP1000 Reactor Coolant Pump High Inertia Flywheel"

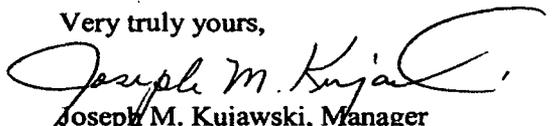
The Application for Withholding is submitted by Curtiss-Wright Electro-Mechanical Corporation (EMD) pursuant to the provisions of Paragraph (b) (1) of Section 2.390 of the Commission's regulations. It contains commercial strategic information proprietary to EMD and customarily held in confidence.

The proprietary material for which withholding is being requested is identified in the proprietary version of the subject report. In conformance with 10 CFR Section 2.390, Affidavit AW-06-112 accompanies this Application for Withholding, setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectively requested that the subject information which is proprietary to EMD be withheld from public disclosure in accordance with 10CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to this Application for Withholding or the accompanying affidavit should reference AW EMD06-001 and should be addressed to Annette Bohinski, Manager of Marketing and Contracts, Curtiss-Wright Electro-Mechanical Corporation, 1000 Cheswick Avenue, Cheswick, Pennsylvania, 15024.

Very truly yours,


Joseph M. Kujawski, Manager
Canned Motor Applications Engineering

ENCLOSURE 2

AW-06-2112

Affidavit

Proprietary Information From Disclosure

November 15, 2006

- (1) I am Manager of Canned Motor Applications Engineering at the Curtiss-Wright Electro-Mechanical Corporation, 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 EMD.
- (2) I am making this Affidavit in conformance with the provisions of 10CFR Section 2.390 of the Commission's regulations and in conjunction with the EMD "Application for Withholding" accompanying in this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by EMD 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 EMD.
 - (ii) The information is of a type customarily held in confidence by EMD and not customarily disclosed to the public. EMD 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 EMD 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 EMD's competitors without license from EMD 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 EMD, its customers or suppliers.
- (e) It reveals aspects of past, present, or future EMD or customer funded development plans and programs of potential commercial value to EMD.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the EMD system which include the following:

- (a) The use of such information by EMD gives EMD a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect EMD.
 - (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes EMD's ability to sell products and services involving the use of the information.
 - (c) Use by our competitor would put EMD 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 EMD of a competitive advantage.
 - (e) Unrestricted disclosures would jeopardize the position of prominence of EMD in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The EMD 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 2.390, 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 AP1000 RCP-06-009 "Structural Analysis Summary for the AP1000 Reactor Coolant Pump High Inertia Flywheel" (Proprietary), dated October 19, 2006, in support of Combined License application pre-application activities for the NuStart Bellefonte COL Project being transmitted by EMD letter AW-06-112 and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse for the AP1000 NuStart Bellefonte plant is expected to be applicable in other licensee submittals in response to certain NRC requirements for justification of compliance of the safety system to regulations.

This information is part of that which will enable EMD to manufacture and deliver products to utilities based on proprietary system designs.

Further this information has substantial commercial value because it reveals the distinguishing aspects of a process or component, structure, tool, method, etc., and the prevention of its use by competitors of EMD, without license from EMD, give EMD a competitive economic advantage.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of EMD because it would enhance the ability of competitors to provide similar technology for Reactor Coolant Pumps for commercial power reactors without commensurate expenses.

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 EMD effort and the expenditure of a considerable sum of money.

In order for competitors of EMD 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.

This information, if used by a competitor, would reduce the competitor's expenditure of resources or improve the competitor's advantage in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.

Further the deponent sayeth not.

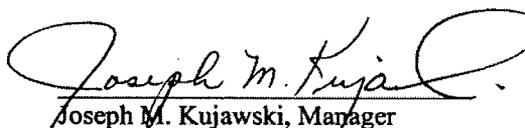
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

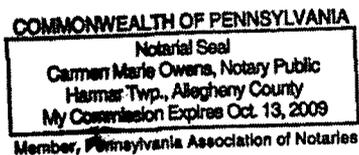
COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Joseph M. Kujawski, who, being by me duly sworn according to law, deposes and says the he is authorized to execute this Affidavit on behalf of Curtiss-Wright Electro-Mechanical Corporation (EMD), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:


Joseph M. Kujawski, Manager
Canned Motor Pump Applications
Curtiss-Wright Electro-Mechanical Corp.

Sworn to and subscribed
before me this 15th day
of November, 2006


Notary Public



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 Curtiss-Wright Electro-Mechanical Corporation (EMD) 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 reports transmitted herewith each bear a EMD 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 10CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by EMD 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.