PROP

Westinghouse Electric Company,
a division of CBS Corporation

Box 355
Pittsburgh Pennsylvania 15230-0355

February 15, 1999

CAW-99-1324

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

Attention: Mr. Samuel J. Collins

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Indian Point Unit 2, Docket No 50-247, Application for Amendment to Operating License to Implement Relaxations Allowed by WCAP-14333-P-A, Revision 1

Dear Mr. Collins:

The application for withholding is submitted by Westinghouse Electric Company, a division of CBS Corporation ("Westinghouse"), pursuant to the provisions of paragraph (b)(1) of Section 2.790 of the Commission's regulations. It contains commercial 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 report. In conformance with 10 CFR Section 2.790, Affidavit CAW-99-1324 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 which 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 CAW-99-1324 and should be addressed to the undersigned.

Very truly yours,

H. A. Sepp, Manager
Regulatory and Licensing Engineering

Enclosure

cc: T. Carter/NRC (5E7)

CAW-99-1324

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

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COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Henry 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 Corporation ("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:

Henry A. Sepp, Manager
Regulatory and Licensing Engineering

Sworn to and subscribed
before me this 15 day
of February, 1999

Notary Public

Notarial Seal
Janet A. Schwab, Notary Public
Monroeville Boro, Allegheny County
My Commission Expires May 22, 2000
Member, Pennsylvania Association of Notaries

(1) I am Manager, Regulatory and Licensing Engineering, in the Nuclear Service Division, of the Westinghouse Electric Company 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 rulemaking proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Energy Systems Business Unit.

(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 Energy Systems Business Unit 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 which 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 Attachments C and D of Consolidated Edison Company of New York, Inc. (Con Edison) Application for Amendment to Operating License, Docket No. 50-247. This information is being transmitted by Consolidated Edison Company of New York, Inc. (Con Edison) letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk, Attention Samuel J. Collins. The proprietary information as submitted for use by Consolidated Edison Company of New York, Inc. (Con Edison), Indian Point Unit 2 is expected to be applicable in other licensee submittals in response to certain NRC requirements for justification of the relaxed allowed outage times and bypass test times contained in WCAP-14333.

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

(a) Provide documentation supporting determination of the WCAP-14333 analysis on a plant specific basis.

(b) Provide the applicable engineering evaluation which establishes the Tier 2 requirements as identified in WCAP-14333

(c) Provide complete licensing packages to support license amendments.

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 implementing the relaxations contained in WCAP-14333.

(b) Westinghouse can sell support and defense of the methodology 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 methodologies 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 for developing the methodology.

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) contained within parentheses 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

ATTACHMENT G

NON-PROPRIETARY VERSIONS OF

ATTACHMENT C AND D

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MAY 1999

Attachment C
Applicability of WCAP-14333 to Indian Point 2

NON-PROPRIETARY VERSIONS OF

ATTACHMENT C

APPLICABILITY OF WCAP-14333

TO

INDIAN POINT UNIT 2

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MAY 1999

Attachment C
Applicability of WCAP-14333 to Indian Point 2

STATEMENT OF APPLICABILITY TO INDIAN POINT NUCLEAR GENERATING UNIT 2

Attachment C
Applicability of WCAP-14333 to Indian Point 2

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Attachment C
Applicability of WCAP-14333 to Indian Point 2

Table 1
WCAP-14333 Implementation Guidelines: Applicability of the Analysis
General Parameters

Parameter	WCAP-14333 Analysis Assumptions	Plant Specific Parameter
Logic Cabinet Type	Relay and SSPS	Relay
Component Test Intervals		
• Analog channels	3 months	3 months
• Logic cabinets (SSPS)	2 months	NA
• Logic cabinets (Relay)	1 month	2 months/staggered[1,2]
• Master Relays (SSPS)	2 months	NA
• Master Relays (Relay)	1 month	2 months/staggered[1,3]
• Slave Relays	3 months	refueling[4]
• Reactor trip breakers	2 months	2 months/staggered[1]
Analog Channel Calibrations		
• Done at-power	yes	yes[5]
• Interval	18 months	24 months
Typical At-Power Maintenance Intervals		
• Analog channels	24 months	$\geq$ 24 months
• Logic cabinets (SSPS)	18 months	NA
• Logic cabinets (Relay)	12 months	$\geq$ 12 months
• Master relays (SSPS)	infrequent	NA
• Master relays (Relay)	infrequent	infrequent
• Slave relays	infrequent	infrequent
• Reactor trip breakers	12 months	$\geq$ 12 months
AMSAC	Credited for AFW pump start	yes

Attachment C
Applicability of WCAP-14333 to Indian Point 2

Total Transient Event Frequency	3.6	3.0
ATWS Contribution to CDF (current PRA model)	8.4E-06	5.8E-07
Total CDF from Internal Events (current PRA model)	5.8E-05	3.4E-05
Total CDF from Internal Events (IPE) (see Table 1A for the list of PRA model changes between the IPE and current model)	Not Applicable	3.8E-05

Notes for Table 1

1. "2 month/staggered": surveillance tests done every 2 months on a staggered basis meaning one RTB/logic train or master relay/logic train is tested every month.

Attachment C
Applicability of WCAP-14333 to Indian Point 2

Table 1A
PRA Model Changes since the IPE

The following changes were made to the plant model since the IPE and taken together are believed to account for the change in overall CDF since the IPE:

- Addition of a sixth fan in the emergency diesel generator building and separation of their power supplies such that failure of two of the three emergency diesel generators will not result in failure of the third.
- Addition of black start capability for gas turbine 2. The IPE did not take credit for this gas turbine.
- Use of a more realistic turbine-driven auxiliary feedwater pump mission time given requirements to proceed to cold shutdown on loss of the two redundant motor-driven pumps.
- Development of detailed fault trees for quantifying loss of service water and loss of component cooling water initiating events.
- More detailed modeling of the AC power, DC power, and charging systems that allowed removal of conservative assumptions.

Attachment C
Applicability of WCAP-14333 to Indian Point 2

Table 2
WCAP-14333 Implementation Guidelines: Applicability of the Analysis (Cont'd)
Reactor Trip Actuation Signals

Event	WCAP-14333 Analysis Assumption	Plant Specific Parameter
Large LOCA	Not Required	Agree
Medium LOCA	Not Required	Agree
Small LOCA	Nondiverse[1] w/OA[2]	Agree
Steam Generator Tube Rupture	Nondiverse w/OA	Agree
Interfacing System LOCA	Not Required	Agree
Reactor Vessel Rupture	Not Required	Agree
Secondary Side Breaks	Nondiverse w/OA	Agree
Transient Events, such as: - Positive Reactivity Insertion - Loss of Reactor Coolant Flow - Total or Partial Loss of Main Feedwater - Loss of Condenser - Turbine Trip - Loss of DC Bus - Loss of Vital AC Bus - Loss of Instrument Air - Spurious Safety Injection - Inadvertent Opening of a Steam Valve	Diverse[3] w/OA	Agree
Reactor Trip	Generated by RPS	Agree
Loss of Offsite Power	Not Required by RPS	Agree
Station Blackout	Not Required by RPS	Agree
Loss of Service Water or Component Cooling Water	Nondiverse w/OA	Agree

Notes for Table 2

1. Nondiverse means that (at least) one signal will be generated to initiate reactor trip for the event.
2. OA indicates that an operator could take action to initiate reactor trip for the event, that is, there is sufficient time for action and procedures are in place that will instruct the operator to take action.
3. Diverse means that (at least) two signals will be generated to initiate reactor trip for the event.

Attachment C
Applicability of WCAP-14333 to Indian Point 2

Table 3
WCAP-14333 Implementation Guidelines: Applicability of the Analysis (Cont'd)
Engineered Safety Features Actuation Signals

Safety Function	Event	WCAP-14333 Analysis Assumption	Plant Specific Parameter
Safety Injection	Large LOCA	Nondiverse[1]	Agree
	Medium LOCA	Nondiverse, OA[2] by SI switch on main control board	Agree
	Small LOCA	Nondiverse, OA by SI switch on main control board, OA of individual components	Agree
	Interfacing Systems LOCA	Nondiverse, OA by SI switch on main control board, OA of individual components	Agree
	SG Tube Rupture	Nondiverse, OA by SI switch on main control board, OA of individual components	Agree
	Secondary Side Breaks	Nondiverse, OA by SI switch on main control board, OA of individual components	Agree
Auxiliary Feedwater Pump Start	Events generating SI signal Transient events	Pump actuation on SI signal Nondiverse, AMSAC, operator action	Agree Agree
Main Feedwater Isolation	Secondary Side Breaks	Nondiverse	Agree
Steamline Isolation	Secondary Side Breaks	Nondiverse	Agree
Containment Spray Actuation	All events	Nondiverse signal	Agree
Containment Isolation	All events	From SI signal	Agree
Containment Cooling	All events	From SI signal	Agree

Notes for Table 3

1. Nondiverse means that (at least) one signal will be generated to initiate the engineered safety feature noted for the event.
2. OA indicates that an operator could take action to initiate the engineered safety feature for the event, that is, there is sufficient time for action and procedures are in place that will instruct the operator to take action.

NON-PROPRIETARY VERSIONS OF

ATTACHMENT D

WCAP-14333 IMPLEMENTATION: TIER 2 REQUIREMENTS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MAY 1999

Attachment D
WCAP-14333 Implementation: Tier 2 Requirements

Purpose

Identify Tier 2 requirements for implementing the allowed outage time changes in WCAP-14333.

Background

The NRC issued a SER on WCAP-14333, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times", on July 15, 1998. The SER approved the topical report and provided requirements for Licensees on implementation of the changes in this WCAP. One of these requirements is:

- Address Tier 2 and 3 analyses including the CRMP (Configuration Risk Management Program) insights which confirm that these insights are incorporated into their decision making process before taking equipment out of service.

Tier 2 analyses are performed to identify any limitations on equipment unavailability when entering an allowed outage time that is risk-informed, such as those justified in WCAP-14333, to preclude potentially high risk configurations. Tier 3 addresses the establishment of a proceduralized CRMP capable of assessing the risk associated with both planned and unplanned work activities. The purpose of these limitations is to ensure that the plant risk does not increase to unacceptable levels if multiple components are out of service simultaneously. The licensee needs to identify these equipment unavailability limitations.

Tier 2 Limitations

Attachment D
WCAP-14333 Implementation: Tier 2 Requirements

[redacted]

ATTACHMENT H

LIST OF COMMITTMENTS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MAY 1999

ATTACHMENT H

LIST OF COMMITTMENTS

Commitment	Due Date
Establish a program of configuration risk management	90 days after receipt of the approved Technical Specification changes

PROP

NRC FORM 190
(9-1998)
NRCMD 3.12

U.S. NUCLEAR REGULATORY COMMISSION

PROPRIETARY INFORMATION

NOTICE

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