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U.S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
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Your ref: Docket No. 52-006
Our ref: DCP_NRC_002896

May 27, 2010

Subject: AP1000 Response to Request for Open Item (SRP 5)

Westinghouse is submitting a response to the NRC request for additional information (RAI) on SRP Section 5. This RAI response is submitted in support of the AP1000 Design Certification Amendment Application (Docket No. 52-006). The information included in this response is generic and is expected to apply to all COL applications referencing the AP1000 Design Certification and the AP1000 Design Certification Amendment Application.

Enclosed are the Proprietary and Non-Proprietary versions of the response for the following RAI(s):

OI-SRP5.4.1-CIB1-01 R1

Also enclosed is one copy of the Curtiss Wright Application for Withholding, WEM_DCP_000472 (non-proprietary) with Proprietary Information Notice, and one copy of the associated Affidavit (non-proprietary).

Questions or requests for additional information related to the content and preparation of this response should be directed to Westinghouse. Please send copies of such questions or requests 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,


Robert Sisk, Manager
Licensing and Customer Interface
Regulatory Affairs and Standardization

/Enclosure

1. Curtiss Wright Application for Withholding and associated Affidavit
2. Proprietary Response to Open Item on SRP Section 5
3. Non-Proprietary Response to Open Item on SRP Section 5

cc:	D. Jaffe	- U.S. NRC	1E
	E. McKenna	- U.S. NRC	1E
	P. Buckberg	- U.S. NRC	1E
	T. Spink	- TVA	1E
	P. Hastings	- Duke Power	1E
	R. Kitchen	- Progress Energy	1E
	A. Monroe	- SCANA	1E
	P. Jacobs	- Florida Power & Light	1E
	C. Pierce	- Southern Company	1E
	E. Schmiech	- Westinghouse	1E
	G. Zinke	- NuStart/Entergy	1E
	R. Grumbir	- NuStart	1E
	J. DeBlasio	- Westinghouse	1E

ENCLOSURE 1

Curtiss Wright Application for Withholding and associated Affidavit



1000 Wright Way
Cheswick, PA 15024
Phone: 724-275-5000
Fax: 724-275-5038

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

Letter No.:
WEM_DCP_000472
July 17, 2009

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 WEM_DCP_000472 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 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to this Application for Withholding or the accompanying affidavit should reference WEM_DCP_000472 and should be addressed to Ms. Annette Bohinski, Senior Contracts Manager, Curtiss-Wright Electro-Mechanical Corporation, 1000 Wright Way, Cheswick, Pennsylvania, 15024.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ross R. Klein'.

Ross R. Klein, P.E.
Engineering Manager
Commercial Nuclear Products
EMD, a business unit of Curtiss-
Wright Flow Control Company
Tel: 724-275-5710
Cell: 412-418-3263

- (1) I am the Engineering Manager for Commercial Nuclear Products 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-06-009P "Structural Analysis Summary for the AP1000 Reactor Coolant Pump High Inertia Flywheel" Revision 2 (Proprietary), dated July 16, 2009 in support of NuStart Energy Development Combined License (COL) Demonstration Project. The proprietary information as submitted by Westinghouse for the AP1000 NuStart COL Demonstration Project 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 Ross R. Klein, who, being by me duly sworn according to law, deposes and says that 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:



Ross R. Klein, P.E.
Engineering Manager
Commercial Nuclear Products
EMD, a business unit of Curtiss-Wright
Flow Control Company

Sworn to and subscribed
before me this 17 day
of July, 2009.


Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Susan M. Hillery, Notary Public
Hammar Twp., Allegheny County
My Commission Expires March 29, 2012
Member, Pennsylvania Association of Notaries

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 an 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.

ENCLOSURE 3

Non-Proprietary Response to Open Item on SRP Section 5

AP1000 TECHNICAL REPORT REVIEW

Response to Open Item (OI)

RAI Response Number: OI-SRP5.4.1-CIB1-01

Revision: 1

Additional Questions: (Revision 1)

A conference call was held 1/25/10 between Westinghouse personnel and the NRC staff. The following are followup questions to OI-SRP5.4.1-CIB1-01:

The following questions are the result of reviewing the RCP flywheel analysis (Curtis Wright report - Rev 2.) with input from the 12/31/09 response to RAI-SRP 5.2.3-CIB1-01 (Questions 1 through 5, which dealt with DCD Rev 17 changes to RCP pressure boundary material that would affect the RCP flywheel analysis).

1. Curtis Wright Report AP1000RCP-06-009-P, Revision 2, dated July 16, 2009, incorporated changes to the outer retainer cylinder from 18Ni Maraging steel to 18Cr-18Mn Alloy steel. This report analyzed the potential of the flywheel penetrating the reactor coolant pump casing. Based on its review, the NRC staff has the following requests for additional information:
 - a. Section 1.0 states that the reactor coolant pressure boundary (stator shell, flange, and casing) is analyzed to demonstrate that a fractured flywheel cannot breach the reactor coolant pump pressure boundary. In addition, Section 3.0 states that surrounding the larger flywheel assembly are the heavy walls of the casing, thermal barrier, and stator closure, and surrounding the smaller flywheel assembly is the heavy wall of the stator lower flange. However Figure 3-1 shows an additional component, stator closure ring, surrounding the larger flywheel assembly, and the thermal barrier, stator closure and stator closure ring are bolted together. Section 5.2.1 states that the shell containment in line with the flywheel heavy metal segments was the only containment material considered. Section 5.2.2 states that the upper flywheel is conservatively assumed to be through the thermal barrier and the adjacent stator closure.
 - i. Discuss whether the new component on the pump, the stator closure ring, was included in the analysis. In addition, provide the results of the analysis.



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|---|
| <ol style="list-style-type: none">a. <i>The information reveals the distinguishing aspects of a process or component, structure, tool, method, etc., and the prevention of its use by competitors of Curtiss-Wright Electro-Mechanical Corporation, without license from Curtiss-Wright Electro-Mechanical Corporation, gives Curtiss-Wright Electro-Mechanical Corporation a competitive economic advantage.</i>b. <i>The 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.</i> |
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AP1000 TECHNICAL REPORT REVIEW

Response to Open Item (OI)

- ii. It should be noted that Section 5.2.3 of the report only states that a flywheel fracture would not penetrate the thermal barrier and stator closure that surround the upper flywheel assembly. However, Westinghouse letter dated December 31, 2009, stated that the casing, thermal barrier, and stator closure ring were considered in the analysis, but not the stator closure. Clarify the discrepancy between these statements.
 - iii. Discuss the material and the number of bolts used in the thermal barrier, stator closure and stator closure ring.
 - iv. Discuss how the thermal barrier, stator closure and stator closure ring can be assumed to be one component since a ruptured flywheel could shear the bolts, and discuss the analysis for this shear mechanism.
 - v. Provide the most up to date Figure 3-1. Please discuss how any changes made to this figure will affect the flywheel analysis.
- b. Discuss how the critical flaw size of the outer retainer cylinder in Sections 2.0 and 5.1 was determined based on the design life used in the evaluation.
 - c. Discuss why the dimensions for the upper and lower flywheel assembly in Sections 5.1.1 and Figure 5-1 were changed. Also, include in the report that this analysis applies only to a flywheel with the same dimensions and materials.

Note:

Changes to the flywheel dimensions or materials, and other changes that would affect the missile penetration analysis (such as surrounding containment thickness) in this report require that the analysis be reevaluated and submitted to the NRC.

- d. Discuss why Section 5.1.4 did not include stress concentration effects of the gap between the heavy metal inserts, similar to Section 5.1.6, in determining the hoop stresses.



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AP1000 TECHNICAL REPORT REVIEW

Response to Open Item (OI)

Additional Westinghouse Response: (Revision 1)

(Westinghouse initially answered this Open Item with the RAI-SRP5.4.1-CIB1-01 R2 response, and considers this the Revision 1 OI response for tracking purposes.)

The following material is extracted from the Curtiss-Wright Electro-Mechanical Corporation (EMD) proprietary document AP1000RCP-06-009, "Structural Analysis Summary for the AP1000 Reactor Coolant Pump High Inertia Flywheel," to answer the Open Item.

1.a.i Flywheel Missile Analysis Discussion

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| <p>a. <i>The information reveals the distinguishing aspects of a process or component, structure, tool, method, etc., and the prevention of its use by competitors of Curtiss-Wright Electro-Mechanical Corporation, without license from Curtiss-Wright Electro-Mechanical Corporation, gives Curtiss-Wright Electro-Mechanical Corporation a competitive economic advantage.</i></p> <p>b. <i>The 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.</i></p> |
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Response to Open Item (OI)



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Response to Open Item (OI)



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Response to Open Item (OI)



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Response to Open Item (OI)



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] ^{a,b}



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AP1000 TECHNICAL REPORT REVIEW

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1.a.ii. As shown in the figure above, the calculation conservatively ignores the main flange and the casing flange. The stator closure, thermal barrier, and the stator closure ring are assumed to provide resistance. Other components were conservatively ignored. Westinghouse letter dated December 31, 2009 transmitted the Revision 1 response to RAI SRP5.2.3-CIB1-01. In the listing of components immediately adjacent (radially) to the upper flywheel, the stator closure was inadvertently omitted. As discussed above, the casing, although in-line with a potential flywheel missile, is not credited in the flywheel missile analysis.

1.a.iii.

] ^{a,b}

1.a.iv. The number of bolts is irrelevant to the calculation, since the primary resistance to a postulated projectile is hoop strength. The thinnest wall thickness of the three components is assumed to be uniform for all three, and no additional length beyond the height of the flywheel is assumed to provide any resistance. These assumptions are very conservative. In using the thinnest component it is not then unreasonable to assume that the three components are in unison, especially considering that two of the three are compressed together by the main flange studs and the third is attached using [] ^{a,b} diameter cap screws, and is backed up in the radial direction by the casing flange.

1.a.v. Figure 3-1 is the most up-to-date sectional view of the AP1000 RCP. Since Figure 3-1 is just an outline depiction of the components of the reactor coolant pump with no dimensions, it is difficult to tie changes to this figure directly to the flywheel missile analysis. However, changes in the flywheel dimensions given in Figure 5-1 and containment wall thicknesses in Table 5-3 will have a direct impact on the flywheel missile analysis.



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1.b. The critical flaw size represents the size of flaw that would result in fracture through the wall of the retainer ring, no matter how this flaw developed. This flaw size is associated with the highest peak stress the retainer ring would ever see, which is during the 125% speed operation. This stress is higher than would occur under any design transient. The EMD inspection criterion assures that such a flaw is not present when the ring is manufactured. Also, such a flaw could not develop from fatigue of a smaller flaw that would be below the inspection detection capability. The fatigue crack growth that could potentially occur for a flaw that is equivalent to the inspection criterion is generally negligible. [

]a,b

1.c. [

]a,b

Pump design features that impact design documentation under configuration control or licensing documents are subject to the Westinghouse change control procedures. Therefore, changes to the dimensions or materials of the flywheel or surrounding containment structures that impact the flywheel missile analysis report must be documented in a design change proposal which is reviewed for impacts by representatives covering the entire plant scope of equipment and structures, as well as safety analysis, operations, and licensing. Documents impacted by the proposed design change are identified during this process and after the design change is approved these impacted documents are linked in a database to the design change. This ensures that the impacted document will be revised to reflect the approved design change.

1.d. [

]a,b



Westinghouse

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Design Control Document (DCD) Revision: None

PRA Revision: None

Technical Report (TR) Revision: None



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