



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

October 26, 2010

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

Watts Bar Nuclear Plant, Unit 2
NRC Docket No. 50-391

10 CFR 50.4

Subject: **WATTS BAR NUCLEAR PLANT (WBN) UNIT 2 – INSTRUMENTATION AND CONTROLS STAFF INFORMATION REQUESTS**

- References:
1. TVA letter dated October 5, 2010, "Watts Bar Nuclear Plant (WBN) Unit 2, Instrumentation and Controls Staff Information Requests"
 2. TVA letter dated July 30, 2010, "Watts Bar Nuclear Plant (WBN) Unit 2 Instrumentation and Controls Staff Information Requests and NRC/TVA Telecom on July 6, 2010, Information Requests"
 3. Licensee Open Items to be Resolved for SER Approval List

The purpose of this letter is to provide resolution of selected Instrumentation and Controls Staff Information Requests and a portion of the vendor documents that TVA committed to submit in support of the responses provided to NRC in TVA's letters dated October 5, 2010 (Reference 1) and July 30, 2010 (Reference 2). Enclosure 1 contains resolution of selected Instrumentation and Controls Staff Information Requests and a description of the vendor documents that are attached to this letter.

In some cases, the attached documents may not be issued/finalized due to ongoing comment resolution. However, due to the insignificance of the comments that were received during the internal review, the conclusions reached in the affected vendor documents will not be invalidated. There was one comment concerning relative humidity that should be noted. The relative humidity value shown in Environmental Qualification (EQ) report for AI687/AI688, EQ-EV-62-WBT will be changed from 10 percent to 20 percent.

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Attachments 1, 3, 4, 5, 6, 7, 8 and 9 contain non-demarcated versions of information proprietary to Westinghouse. TVA requests that this Westinghouse proprietary information be withheld from public disclosure in accordance with 10 CFR § 2.390.

Attachments 2, 10, 11, 12 and 13 contain the Application for Withholding Proprietary Information from Public Disclosure Affidavit for the Westinghouse documents in Attachments 1, 9, 4, 5 and 6, respectively. The withholding affidavits for Attachments 3, 7 and 8 will be submitted by April 29, 2011 (see Enclosure 2, Commitments).

The demarcated proprietary documents and nonproprietary documents for Attachments 1, 3, 4, 5, 6, 7, 8 and 9 will be provided by April 29, 2011 (see Enclosure 2, Commitments).

Enclosure 2 contains the new regulatory commitments contained in this letter.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on the 26th day of October, 2010.

If you have any questions, please contact William Crouch at (423) 365-2004.

Sincerely,


Masoud Bajestani
Watts Bar Unit 2 Vice President

Enclosures:

1. Resolution of Instrumentation And Controls Staff Information Requests and Summary Description of Attachments
2. Regulatory Commitments

cc (Enclosures):

U. S. Nuclear Regulatory Commission
Region II
Marquis One Tower
245 Peachtree Center Ave., NE Suite 1200
Atlanta, Georgia 30303-1257

NRC Resident Inspector Unit 2
Watts Bar Nuclear Plant
1260 Nuclear Plant Road
Spring City, Tennessee 37381

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1. NRC Request (Matrix Item Number 041, TVA Commitment No. 5):

Please provide the following Westinghouse documents:

- (1) WNA-DS-01617-WBT Rev. 1, "PAMS System Requirements Specification"*
- (2) WNA-DS-01667-WBT Rev. 0, "PAMS System Design Specification"*
- (3) WNA-CD-00018-GEN Rev. 3, "CGD for QNX version 4.5g"*

Please provide the following Westinghouse documents or pointers to where the material was reviewed and approved in the CQ TR or SPM:

- (4) WNA-PT-00058-GEN Rev. 0, "Testing Process for Common Q Safety systems"*
- (5) WNA-TP-00357-GEN Rev. 4, "Element Software Test Procedure"*

Follow-up NRC Request:

TVA to docket information indentified in Compliance Matrix.

TVA Partial Revised Response:

This is a partial response that addresses Item (5). Items 1 through 4 will be addressed later. Item (5) WNA-TP-00357-GEN is superseded by the Software Program Manual (SPM) compliance matrix in the Licensing Technical Report Revision 1.

Attachment 1 contains the proprietary version of Westinghouse document "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

Attachment 2 contains the Westinghouse document "Application for Withholding Proprietary Information from Public Disclosure, WNA-LI-00058-WBT, Revision 1, Tennessee Valley Authority (TVA) Watts Bar Unit 2 (WBN2) Post-Accident Monitoring System (PAMS) Licensing Technical Report, (Proprietary)," dated October 7, 2010.

2. NRC Request (Matrix Item Number 082):

The PAMS Licensing Technical Report (WNA-LI-00058-WBT Rev. 0, Dated April 2010), in Section 2.3, lists hardware/software changes to the Common Q PAMS previously reviewed by the NRC. However the Common Q ISG-6 Compliance Matrix does not contain activities that address qualification of all changes specifically:

- 2.c - CI527 AF100 Peripheral Component Interconnect (PCI) interface card*
- 3. - Common Q TC514 AF100 Fiber Optic Modems (Evolutionary Product Maintenance/Improvements)*
- 4.a - PM646A Processor Module*
- 4.b - CI631 AF100 Communication Interface Module*
- 4.e - DO620 Digital Output Card*

Please provide sufficient detail regarding the changes for the NRC to independently evaluate the acceptability of the changes.

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Follow-up NRC Request:

Regulations require that the NRC review be based on docketed material. Awaiting for document to be docketed by TVA.

In the August 17, 2010 public meeting Westinghouse stated that the Commercial Dedication Instructions (CDI) were the plans. The NRC requested that the plans and associated reports be docketed.

TVA Revised Partial Response:

Revision 1 of the Licensing Technical Report provides the requested additional detail on the platform specific to WBN Unit 2 and references to the evaluation documentation. Additional information is provided in the equipment qualification reports.

Attachment 1 contains the proprietary version of Westinghouse document "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report," Revision 1, WNA-LI-00058-WBT-P, dated October 2010.

Attachment 4 contains the proprietary version of Westinghouse document "AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations," (EQ-QR-64-GEN, Revision 0), dated September 2010.

Attachment 5 contains the proprietary version of Westinghouse document "Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT) Requirements," (EQ-EV-62-WBT, Revision 0), dated September 2010.

Attachment 6 contains the proprietary version of Westinghouse document "Environmental and Seismic Test Report, Analog Input (AI)687 & AI688 Modules and Supporting Components for use in Common Q PAMS," (EQLR-171, Revision 0), dated September 2010.

Attachment 9 contains the proprietary version of Westinghouse document "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post Accident Monitoring System (PAMS)," CN-EQT-10-44, Revision 0, dated September 28, 2010.

Attachment 10 contains the Westinghouse document: Application For Withholding Proprietary Information From Public Disclosure CN-EQT-10-44, Revision 0, "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post Accident Monitoring System (PAMS)," (Proprietary), dated October 1, 2010.

Attachment 11 contains the Westinghouse document: Application For Withholding Proprietary Information From Public Disclosure, EQ-QR-64-GEN, Revision 0, "AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations," dated September 28, 2010.

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Attachment 12 contains the Westinghouse document: Application For Withholding Proprietary Information From Public Disclosure, EQ-EV-62-WBT, Revision 0, "TVAWBT AI687 and AI688, Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT) Requirements," (Proprietary), dated October 1, 2010.

Attachment 13 contains the Westinghouse document: Application For Withholding Proprietary Information From Public Disclosure, EQLR-171, Revision 0, "Environmental and Seismic Test Report, Analog Input (AI)687 & AI688 Modules and Supporting Components for use in Common Qualified (Common Q) Post Accident Monitoring System (PAMS)," (Proprietary), dated September 30, 2010.

3. NRC Request (Matrix Item Number 142, TVA Commitments Nos. 10 and 17):

The applicable regulatory guidance for reviewing the WBN2 PAMS SysRS would be IEEE 830 as endorsed by Regulatory Guide 1.172 and BTP 7-14 Section B.3.3.1, Requirements Activities – Software Requirements Specifications." IEEE 830-1994 Section 4.3.8, "Traceable," states: "A [requirements specification] is traceable of the origin of each of its requirements is clear..."

1. *How did TVA ensure the traceability of each requirement in the WBN2 PAMS SysRS.*
2. *Explain the source(s) of the requirements present in the Post Accident Monitoring System's Software Requirements Specification. To clarify, many documents have requirements that are incorporated by reference into the SRS, but what served to direct the author to include those various documents in the SRS or, if the requirement is based on the System Requirements Specification, what directed the author to include the requirement there?*
3. *Clarify whether the unnumbered paragraphs in the Post Accident Monitoring System's Software Requirements Specification, such as in the section headings, or are all such sections simply considered to be informative?*

Does the same apply to documents referenced by the SRS? Such as WCAP-16096-NP-A, Rev. 1A, "Software Program Manual for Common Q Systems," which is incorporated by reference in requirement R2.3-2 in the SRS.

R2.3-2 [The PAMS software shall comply with the requirements and guidelines defined in WCAP-16096-NP-A, "Software Program Manual for Common Q Systems" (reference 5).]

If any requirements are expressed in such unnumbered paragraph form instead of individually identified requirements, please list them, describe why they satisfy the fundamental requirement of unambiguity, and describe how they were verified.

4. *Are there any sources of requirements in parallel with the Post Accident Monitoring System's Software Requirements Specification? Meaning does the SRS contain, explicitly or by reference, all the requirements that were used in the design phase for the application specific software, or do software design phase*

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activities use requirements found in any other source or document? If so, what are these sources or documents?

5. *References 12, 27, 29, and 31-44 in the Post Accident Monitoring System's Software Requirements Specification are various types of "...Reusable Software Element...".*

These references are used in the body of the SRS, for example:"

R5.3.14-2 [The Addressable Constants CRC error signal shall be TRUE when any CAL CRC's respective ERROR terminal = TRUE (WNA-DS-00315-GEN, "Reusable Software Element Document CRC for Calibration Data" [Reference 12]).]

They are also included via tables such as found in requirement R7.1.2-1

[The Watts Bar 2 PAMS shall use the application-specific type circuits and custom PC elements listed in Table 7.1-1.]

Do the referenced reusable software element documents include requirements not explicitly stated in the SRS? If so what is their origin?

TVA Partial Response:

NOTE: The scope of this original NRC request has been expanded to track all traceability issues with the Software Requirements Specification (SRS). Due to the increase in scope, only the original NRC request verbiage is included in this letter.

This is a partial response that addresses Items 1, 2 and 3. Items 4 and 5 will be addressed later. Items 1, 2 and 3 are addressed by revision of the Requirements Traceability Matrix (RTM), SRS, System Requirements Specification (SysRS), and the System Design Specification (SysDS). The revised SRS, SysRS, and SysDS are attached as identified below:

- Attachment 3 contains the proprietary version of Westinghouse document "Nuclear Automation, Watts Bar 2 NSSS Completion Program, I&C Projects, Software Requirements Specification for the Post Accident Monitoring System, WNA-SD-00239-WBT, Revision 2, dated September 2010."
- Attachment 7 contains the proprietary version of Westinghouse document "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System - System Requirements Specification" WNA-DS-01617-WBT", Revision 2 dated August 2010.
- Attachment 8 contains the proprietary version of Westinghouse document "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System - System Design Specification", WNA-DS-01667-WBT, Revision 2 dated September 2010. In response to NRC request for a Westinghouse document submittal schedule, the following is provided:

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The following notes apply:

1. The Common Q PAMS items that are beyond the December 31, 2010 NRC completion date are annotated in the small triple barred area.
 - a. The FAT has been accepted as an open item by the NRC.
 - b. The "as-tested" hardware drawings are no longer required to support licensing activities. Revision 1 of the Licensing Technical Report includes the equipment list which was the original reason for submitting hardware drawings.
 - c. TVA is working with Westinghouse to improve the schedule for submittal of the Common Q PAMS System EQ Summary Report.
2. When possible, two weeks were allowed from document receipt for TVA Licensing to submit the document to the NRC.
3. For documents that TVA has not seen before, TVA allowed three weeks from document receipt to submit the document to the NRC.
4. The table is sorted by document receipt from Westinghouse date.

| Westinghouse Licensing Document | Date to TVA | Date to NRC |
|--|--------------------|--------------------|
| Common Q PAMS AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations (EQ-QR-64-GEN, R0) | 09/30/10 | 10/22/10 |
| Common Q PAMS Software Requirements Specification (SRS) | 10/01/10 | 10/22/10 |
| Common Q PAMS Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT) Requirements (EQ-EV-62-WBT, R0) | 10/01/10 | 10/22/10 |
| Common Q PAMS Environmental and Seismic Test Report, AI687 & AI688 Modules for use in Common Q PAMS (EQLR-171, R0) | 10/01/10 | 10/22/10 |
| Common Q PAMS Licensing Technical Report Revision 1 | 10/08/10 | 10/22/10 |
| Common Q PAMS Prop & Non-Prop Failure Modes and Effects Analysis | 10/22/10 | 11/12/10 |
| Common Q PAMS IV&V Requirements Phase Summary Report | 10/29/10 | 12/20/10 |
| Common Q PAMS FAT Procedure | 11/10/10 | 11/24/10 |
| Common Q PAMS Specific Test Plan | 11/12/10 | 12/07/10 |
| Common Q PAMS Licensing Technical Report Revision 2 | 11/19/10 | 12/03/10 |
| Common Q PAMS IV&V Design & Implementation Phase Summary Report | 11/19/10 | 12/21/10 |
| Common Q PAMS Issue Prop & Non-Prop version of the Common Q Software Requirements Specification PAMS 00000-ICE-3238 Revision 5 | 12/03/10 | 12/31/10 |
| Common Q PAMS IV&V Integration Phase Summary Report | 12/10/10 | 12/31/10 |
| Common Q PAMS FAT Report (Note 1.a.) | 01/28/11 | 02/18/11 |
| Common Q PAMS "as-tested" hardware drawings (Note 1.b.) | 02/25/11 | 03/18/11 |
| Common Q PAMS System EQ Summary Report (Note 1.c.) | 03/04/11 | 03/25/11 |

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4. NRC Request (Matrix Item Number 143):

The WBN2 PAMS Software Requirements Specification (WBN2 PAMS SRS – ML101050202) contains a table (see page iii) titled, “Document Traceability & Compliance,” which states that the WBN2 PAMS SRS was created to support the three documents identified (one of which is the WBN2 PAMS SysRS). Section 1.1, “Overview,” of the WBN2 PAMS SRS states: “This document describes requirements for the major software components ...”

- (a) Please list and describe each of the “major software components”. Please include a description of any NRC review for each of these components.*
- (b) Please list and describe each of the other software components. Please include a description of any NRC review for each of these components.*
- (c) What other documents contain the requirements for the other software components?*

The WBN2 PAMS System Design Specification (WBN2 PAMS SDS) contains a table (see page iii) titled, “Document Traceability & Compliance,” which states that the WBN2 PAMS SysRS was created to support the WBN2 PAMS SysRS. Section 1.1, “Purpose,” of the WBN2 PAMS SDS states: “The purpose of this document is to define the hardware design requirements ...”

- (d) Do the WBN2 PAMS SRS and SDS, together, implement all of the requirements in the WBN2 PAMS SysRS?*
- (e) Please briefly describe all of the documents that implement the WBN2 PAMS SysRS.*

TVA Partial Response:

NOTE: The scope of this original NRC request has been expanded to track all traceability issues with the SysRS. Due to the increase in scope, only the original NRC request verbiage is included in this letter.

This is a partial response that addresses Items (a) and (e). Items (b), (c) and (d) will be addressed later. Items (a) and (e) are addressed by revision of the RTM, SRS, SysRS, and the SysDS.

The revised SRS, SysRS and SysDS are attached as identified below:

- Attachment 3 contains the proprietary version of Westinghouse document “Nuclear Automation, Watts Bar 2 NSSS Completion Program, I&C Projects, Software Requirements Specification for the Post Accident Monitoring System, WNA-SD-00239-WBT, Revision 2, dated September 2010.”

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- Attachment 7 contains the proprietary version of Westinghouse document “Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System- System Requirements Specification” WNA-DS-01617-WBT”, Revision 2 dated August 2010.
- Attachment 8 contains the proprietary version of Westinghouse document “Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System – System Design Specification”, WNA-DS-01667-WBT, Revision 2 dated September 2010.

5. NRC Request (Matrix Item Number 145, TVA Commitment 117):

The WBN2 PAMS System Design Specification (WBN2 PAMS SDS) contains a table (see page iii) titled, “Document Traceability & Compliance,” which states that the WBN2 PAMS SDS was created to support the WBN2 PAMS SysRS.

(a) Does the WBN2 PAMS SDS implement all of the hardware requirements in the WBN2 PAMS SysRS?

(b) Please briefly describe all of the documents that implement the hardware requirements of the WBN2 PAMS SysRS.

TVA Partial Response:

NOTE: The scope of this original NRC request has been expanded to track all traceability issues with the SysDS. Due to the increase in scope, only the original NRC request verbiage is included in this letter.

Items (a) and (b) are addressed by revision of the RTM, SRS, SysRS, and the SysDS. Additional submittals are required to fully address the revised scope of this item.

The revised SRS, SysRS and SysDS are attached as identified below:

- Attachment 3 contains the proprietary version of Westinghouse document “Nuclear Automation, Watts Bar 2 NSSS Completion Program, I&C Projects, Software Requirements Specification for the Post Accident Monitoring System”, WNA-SD-00239-WBT, Revision 2, dated September 2010.
- Attachment 7 contains the proprietary version of Westinghouse document “Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System- System Requirements Specification” WNA-DS-01617-WBT”, Revision 2 dated August 2010.

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- Attachment 8 contains the proprietary version of Westinghouse document "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System – System Design Specification", WNA-DS-01667-WBT, Revision 2 dated September 2010.

6. NRC Request (TVA Commitment No. 13, Matrix Item Number 202):

The letter (ML0003740165) which transmitted the Safety Evaluation for the Common Q topical report to Westinghouse stated: "Should our criteria or regulations change so that our conclusions as to the acceptability of the report are invalidated, CE Nuclear Power and/or the applicant referencing the topical report will be expected to revise and resubmit their respective documentation, or submit justification for continued applicability of the topical report without revision of the respective documentation." Question No 81 identified many criteria changes; please revise the respective documentation or submit justification for continued applicability of the topical report.

TVA Partial Response:

Revision 1 of the Licensing Technical Report provides the requested additional detail on the changes to the platform.

Attachment 1 contains the proprietary version of Westinghouse document "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

7. NRC Request (Matrix Item Number 213):

By letter dated June 18, 2010 (ML101940236) TVA stated (Enclosure 1, Attachment 3, Item No. 3) that the PAMS system design specification and software requirements specification contain information to address the "Theory of Operation Description." The staff has reviewed these documents, and it is not clear how this is the case. The docketed material does not appear to contain the design basis information that is required to evaluate compliance with the Clause of IEEE 603.

- (1) *Please provide the design basis (as described in IEEE 604 Clause 4) of the Common Q PAMS.*
- (2) *Please provide a regulatory evaluation of how the PAMs complies with the applicable regulatory requirements for the theory of operation.*

For example: Regarding IEEE 603 Clause 5.8.4 (1) What are the manually controlled protective actions? (2) How do the documents identified demonstrate compliance with this clause?

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TVA Response:

Conformance with IEEE 603 is documented in the revised Common Q PAMS Licensing Technical Report and the Common Q PAMS SysDS.

Attachment 1 contains the proprietary version of Westinghouse document "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

Attachment 8 contains the proprietary version of Westinghouse document "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System – System Design Specification", WNA-DS-01667-WBT, Revision 2 dated September 2010.

8. NRC Request (Matrix Item Number 244):

Section 8.2.2 of the Common Q SPM (ML050350234) states that the Software Requirements Specification (SRS) shall be developed using IEEE 830 and RE 1.172. Clause 4.8, "Embedding project requirements in the SRS," of the IEEE 830 states that an SRS should address the software product, not the process of producing the software. In addition Section 4.3.2.1 of the SPM states "Any alternatives to the SPM processes or additional project specific information for the ...SCMP...shall be specified in the PQP."

Contrary to these two statements in the SPM, the WBN2 PAMS SRS (ML101050202) contains many process related requirements, for example all seventeen requirements in Section 2.3.2, "Configuration Control," address process requirements for configuration control.

Please explain how the above meets the intent of the approved SPM.

TVA Response:

The process related requirements have been removed from Revision 2 of the SRS.

Attachment 3 contains the proprietary version of Westinghouse document "Nuclear Automation, Watts Bar 2 NSSS Completion Program, I&C Projects, Software Requirements Specification for the Post Accident Monitoring System", WNA-SD-00239-WBT, Revision 2, dated September 2010.

9. NRC Request (Matrix Item Number 246):

Section 4.3.2.1, "Initiation Phase" of the Common Q SPM (ML050350234) requires that a Project Quality Plan (PQP) be developed. Many other section of the SPM identify that this PQP should contain information required by ISG6. Please provide the PQP. If "PQP" is not the name of the documentation produced, please describe the documentation produced and provide the information that the SPM states should be in the PQP.

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TVA Response:

As discussed and agreed to by the NRC, ISG6 does not apply to the Common Q PAMS platform. The information required to address this question concerning the PQP and SPM has been added to compliance matrix in Revision 1 of the Licensing Technical Report.

Attachment 1 contains the proprietary version of Westinghouse document "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

10. NRC Request (Matrix Item Number 247):

As part of the Common Q topical report development effort, Westinghouse developed the Software Program Manual for Common Q Systems (ML050350234) to address software planning documentation. The NRC reviewed the SPM and concluded: "the SPM specifies plans that will provide a quality software life cycle process, and that these plans commit to documentation of life cycle activities that will permit the staff or others to evaluate the quality of the design features upon which the safety determination will be based. The staff will review the Implementation of the life cycle process and the software life cycle process design outputs for specific applications on a plant-specific basis." Please identify the implementation documentation produced as a result of following the SPM, and state what information will be docketed.

TVA Response:

The implementation documents required by the SPM are identified in the compliance matrix in Revision 1 of the Licensing Technical Report.

Attachment 1 contains the proprietary version of Westinghouse document "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

11. NRC Request (Matrix Item Number 248):

As part of the Common Q topical report development effort, Westinghouse developed the Software Program Manual for Common Q Systems (ML050350234) to address software planning documentation. The NRC reviewed the SPM and concluded: "the SPM specifies plans that will provide a quality software life cycle process, and that these plans commit to documentation of life cycle activities that will permit the staff or others to evaluate the quality of the design features upon which the safety determination will be based. The staff will review the Implementation of the life cycle process and the software life cycle process design outputs for specific applications on a plant-specific basis." Please identify the design outputs produced as a result of following the SPM, and state when what information will be docketed.

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TVA Response:

The documents are identified in the compliance matrix in Revision 1 of the Licensing Technical Report.

Attachment 1 contains the proprietary version of Westinghouse document "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

12. NRC Request (Matrix Item Number 250):

The SPM describes the software and documents that will be created and placed under configuration control. The SCMP (e.g., SPM Section 6, "Software Configuration Management Plan") describes the implementation tasks that are to be carried out. The acceptance criterion for software CM implementation is that the tasks in the SCMP have been carried out in their entirety. Documentation should exist that shows that the configuration management tasks for that activity group have been successfully accomplished. Please provide information that shows that the CM tasks have been successfully accomplished for each life cycle activity group.

TVA Response:

Westinghouse develops Software Release Reports/Records and a Configuration Management Release Report. The SPM describes the documents and when they will be produced. The SPM also summarizes the guidance on how to produce these records, focus on project specific requirements in SPM, etc. The required information from the SPM is included in the compliance matrix in the revised Licensing Technical Report.

Attachment 1 contains the proprietary version of Westinghouse document "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

13. NRC Request (Matrix Item Number 251):

The SPM describes the software testing and documents that will be created. The SPM also describes the testing tasks that are to be carried out. The acceptance criterion for software test implementation is that the tasks in the SPM have been carried out in their entirety. Please provide information that shows that testing been successfully accomplished.

TVA Response:

The software testing performed and documents created are addressed by the SPM Compliance matrix contained in Revision 1 of the Licensing Technical Report.

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Attachment 1 contains the Proprietary version of Westinghouse's document titled "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

14. NRC Request (Matrix Item Number 267):

By letter dated June 18, 2010 (ML101940236) TVA stated that the software safety plan (SSP) was not applicable to PAMS applications (see Watts Bar 2 - Common Q PAMS ISG-6 Compliance matrix Item No. 10); however, reference No. 30 of the SRS (ML101050202) is: 00000-ICE-37727, Rev. 0, "Post Accident Monitoring System Software Preliminary Hazard Analysis for the Common Q PAMS Project." A Preliminary Hazard Analysis is required by the SSP. Please explain.

TVA Response:

This is addressed in the Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P.

Attachment 1 contains the Proprietary version of Westinghouse's document titled "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report, Revision 1, WNA-LI-00058-WBT-P, dated October 2010."

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Attachments

1. Proprietary version of Westinghouse document: "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report," Revision 1, WNA-LI-00058-WBT-P, dated October 2010.
2. Application for Withholding Proprietary Information from Public Disclosure, WNA-LI-00058-WBT, Revision 1, "Tennessee Valley Authority (TVA) Watts Bar Unit 2 (WBN2) Post-Accident Monitoring System (PAMS) Licensing Technical Report," (Proprietary)," dated October 7, 2010.
3. Proprietary version of Westinghouse document: "Nuclear Automation, Watts Bar 2 NSSS Completion Program, I&C Projects, Software Requirements Specification for the Post Accident Monitoring System," WNA-SD-00239-WBT, Revision 2, dated September 2010.
4. Proprietary version of Westinghouse document: "AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations," (EQ-QR-64-GEN, Revision 0), dated September 10, 2010.
5. Proprietary version of Westinghouse document: "Common Q PAMS Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules and Supporting Components to the Watts Bar Unit 2 (WBT) Requirements" (EQ-EV-62-WBT, Revision 0), dated September 2010.
6. Proprietary version of Westinghouse document: "Environmental and Seismic Test Report, Analog Input (AI)687 & AI688 Modules for use in Common Q PAMS," (EQLR-171, Revision 0), dated September 2010.
7. Proprietary version of Westinghouse document: "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects-Post Accident Monitoring System - System Requirements Specification," WNA-DS-01617-WBT Revision 2, dated August 2010.
8. Proprietary version of Westinghouse document: "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects-Post Accident Monitoring System - System Design Specification," WNA-DS-01667-WBT, Revision 2, dated September 2010.
9. Proprietary version of Westinghouse document: "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post Accident Monitoring System (PAMS)," CN-EQT-10-44, Revision 0, dated September 28, 2010.
10. Application For Withholding Proprietary Information From Public Disclosure, CN-EQT-10-44, Revision 0, "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post Accident Monitoring System (PAMS)," (Proprietary), dated October 1, 2010.

Enclosure 1
TVA Letter Dated October 26, 2010
Responses to Licensee Open Items to be Resolved for SER Approval

11. Application For Withholding Proprietary Information From Public Disclosure, EQ-QR-64-GEN, Revision 0, "AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations," dated September 28, 2010.
12. Application For Withholding Proprietary Information From Public Disclosure, EQ-EV-62-WBT, Revision 0, "TVA/WBT AI1687 and AI1688, Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT) Requirements," (Proprietary), dated October 1, 2010
13. Application For Withholding Proprietary Information From Public Disclosure, EQLR-171, Revision 0, "Environmental and Seismic Test Report, Analog Input (AI)687 and AI688 Modules and Supporting Components for use in Common Q PAMS," (Proprietary), dated September 30, 2010.

ENCLOSURE 2

TVA Letter Dated October 26, 2010 Responses to Licensee Open Items to be Resolved for SER Approval

Regulatory Commitments

1. By April 29, 2011, the demarcated proprietary documents, nonproprietary documents, as well as the withholding affidavits for the proprietary documents listed in commitments i, j and k below, will be provided to NRC.
 - a. Demarcated proprietary and nonproprietary versions of "Tennessee Valley Authority (TVA), Watts Bar Unit 2 (WBN2), Post-Accident Monitoring System (PAMS), Licensing Technical Report," Revision 1, WNA-LI-00058-WBT-P, dated October 2010.
 - b. Demarcated proprietary and nonproprietary versions of "Nuclear Automation, Watts Bar 2 NSSS Completion Program, I&C Projects, Software Requirements Specification for the Post Accident Monitoring System," WNA-SD-00239-WBT, Revision 2, dated September 2010.
 - c. Demarcated proprietary and nonproprietary versions of "AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations," (EQ-QR-64-GEN, Revision 0), dated September 10, 2010.
 - d. Demarcated proprietary and nonproprietary versions of Common Q PAMS Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT) Requirements (EQ-EV-62-WBT, Revision 0), dated September 10, 2010.
 - e. Demarcated proprietary and nonproprietary versions of "Environmental and Seismic Test Report, AI687 & AI688 Modules for use in Common Q PAMS," (EQLR-171, Revision 0), dated September 10, 2010.
 - f. Demarcated proprietary and nonproprietary versions of "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System - System Requirements Specification," WNA-DS-01617-WBT, Revision 2 dated August 2010.
 - g. Demarcated proprietary and nonproprietary versions of "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System - System Design Specification," WNA-DS-01667-WBT, Revision 2, dated September 2010.
 - h. Demarcated proprietary and nonproprietary versions of "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post Accident Monitoring System (PAMS)," CN-EQT-10-44, Revision 0, dated September 28, 2010"
 - i. Affidavit for withholding for "Nuclear Automation, Watts Bar 2 NSSS Completion Program, I&C Projects, Software Requirements Specification for the Post Accident Monitoring System," WNA-SD-00239-WBT, Revision 2, dated September 2010.

ENCLOSURE 2

TVA Letter Dated October 26, 2010

Responses to Licensee Open Items to be Resolved for SER Approval

- j. Affidavit for withholding for "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System - System Requirements Specification," WNA-DS-01617-WBT, Revision 2, dated August 2010.
- k. Affidavit for withholding for "Nuclear Automation Watts Bar 2 NSSS Completion Program I&C Projects Post Accident Monitoring System - System Design Specification," WNA-DS-01667-WBT, Revision 2, dated September 2010.

ENCLOSURE 1

**TVA Letter Dated October 26, 2010
Responses to Licensee Open Items to be Resolved for SER Approval**

Attachment 2

Westinghouse document "Application for Withholding
Proprietary Information from Public Disclosure,
WNA-LI-00058-WBT, Revision 1, Tennessee Valley Authority (TVA)
Watts Bar Unit 2 (WBN2) Post-Accident Monitoring System (PAMS)
Licensing Technical Report, (Proprietary),"
dated October 7, 2010



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

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

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Direct fax: (412) 374-3846
e-mail: greshaja@westinghouse.com
Proj letter WBT-D-2473

CAW-10-2969

October 7, 2010

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WNA-LI-00058-WBT, Revision 1, "Tennessee Valley Authority (TVA) Watts Bar Unit 2 (WBN2) Post-Accident Monitoring System (PAMS) Licensing Technical Report," (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-10-2969 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 Tennessee Valley Authority (TVA).

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-10-2969 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 cursive script that reads "J. A. Gresham for".

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

Enclosures

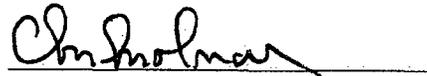
AFFIDAVIT

STATE OF CONNECTICUT:

SS

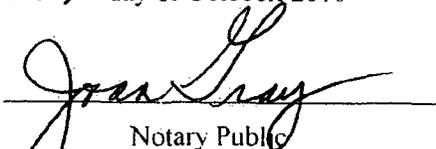
COUNTY OF HARTFORD:

Before me, the undersigned authority, personally appeared C. M. Molnar, 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:



C. M. Molnar, Senior Engineer
Regulatory Compliance and Plant Licensing

Sworn to and subscribed before me
this 7th day of October, 2010


Notary Public

Subscribed and Sworn to before me, a Notary Public, in and for County of Hartford and State of Connecticut, this 7th day of OCTOBER, 2010.

JOAN GRAY
Notary Public
My Commission Expires January 31, 2012

- (1) I am Senior Engineer, 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 Proprietary Information from Public Disclosure 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 WNA-LI-00058-WBT-P, Revision 1, "Tennessee Valley Authority (TVA) Watts Bar Unit 2 (WBN2) Post-Accident Monitoring System (PAMS) Licensing Technical Report," dated October 2010, for submittal to the Commission, being transmitted by Tennessee Valley Authority letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the NRC review of the Post-Accident Monitoring System (PAMS) being designed for Watts Bar Unit 2, and may be used only for that purpose.

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

- (a) Assist the customer in providing requested technical licensing information to the NRC that is required for approval of the Common Q Post-Accident Monitoring System (PAMS).

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purpose of other plant-specific applications.
- (b) Its use by a competitor would improve his competitive position in the design and licensing of a similar product.
- (c) The information requested to be withheld reveals the distinguishing aspects of a design methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar instrumentation and control systems and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

COPYRIGHT NOTICE

The 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.

Withhold from Public Disclosure Under 10 CFR 2.390

ENCLOSURE 1

**TVA Letter Dated October 26, 2010
Responses to Licensee Open Items to be Resolved for SER Approval**

Attachment 10

Application For Withholding Proprietary Information From Public Disclosure,
CN-EQT-10-44, Revision 0, "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post
Accident Monitoring System (PAMS)," (Proprietary), dated October 1, 2010



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

U.S. Nuclear Regulatory Commission
Document Control Desk
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Direct fax: (412) 374-3846
e-mail: greshaja@westinghouse.com
Proj letter: WBT-D-2470

CAW-10-2972

October 1, 2010

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: CN-EQT-10-44, Revision 0, "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post Accident Monitoring System (PAMS)" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-10-2972 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.

The subject document was prepared and classified as Westinghouse Proprietary Class 2. Westinghouse requests that the document be considered proprietary in its entirety. As such, a non-proprietary version will not be issued.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Tennessee Valley Authority.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-10-2972, 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'.

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

Enclosures

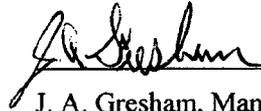
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

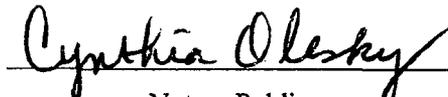
Before me, the undersigned authority, personally appeared J. A. Gresham, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit 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 1st day of October 2010


Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Cynthia Olesky, Notary Public
Manor Boro, Westmoreland County
My Commission Expires July 16, 2014
Member, Pennsylvania Association of Notaries

- (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 Proprietary Information from Public Disclosure 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 contained in CN-EQT-10-44, Revision 0, "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post Accident Monitoring System (PAMS)," (Proprietary) dated September 28, 2010, for submittal to the Commission, being transmitted by Tennessee Valley Authority letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the Watts Bar Unit 2 Post Accident Monitoring System (PAMS) and may be used only for that purpose.

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

- (a) Supply technical support for Westinghouse-supplied Post Accident Monitoring Systems.
- (b) Maintain competitive position in the nuclear market place.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for the purpose of maintaining Westinghouse-supplied PAMS systems.
- (b) Westinghouse can sell support and defense of licensing services.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar analysis and 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.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith is the proprietary version of a document furnished to the NRC in connection with requests for generic and/or plant-specific review and approval. The document is to be considered proprietary in its entirety.

COPYRIGHT NOTICE

The report transmitted herewith bears a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in this report which is 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. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

Tennessee Valley Authority

Letter for Transmittal to the NRC

The following paragraphs should be included in your letter to the NRC:

Enclosed are:

1. ___ copies of CN-EQT-10-44, Revision 0, "Dynamic Similarity Analysis for the Watts Bar Unit 2 Post Accident Monitoring System (PAMS)" (Proprietary)

Also enclosed is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-10-2972, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice.

As Item 1 contains information proprietary to Westinghouse Electric Company LLC, 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 respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-10-2972 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.

Withhold from Public Disclosure Under 10 CFR 2.390

ENCLOSURE 1

**TVA Letter Dated October 26, 2010
Responses to Licensee Open Items to be Resolved for SER Approval**

Attachment 11

Westinghouse Document Application For Withholding Proprietary Information From
Public Disclosure, EQ-QR-64-GEN, Revision 0,
"AI687 and AI688 for use in Common Q PAMS EMC Test Report
and Installation Limitations," dated September 28, 2010



Westinghouse Electric Company
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CAW-10-2904

September 28, 2010

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: EQ-QR-64-GEN, Revision 0, "AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations"

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-10-2904 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.

The subject document was prepared and classified as Westinghouse Proprietary Class 2. Westinghouse requests that the document be considered proprietary in its entirety.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Tennessee Valley Authority.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-10-2904, 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

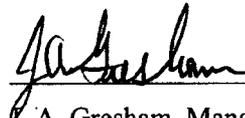
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

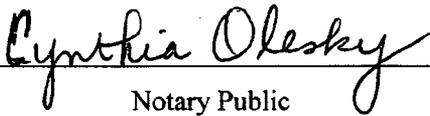
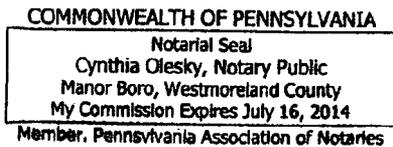
Before me, the undersigned authority, personally appeared J. A. Gresham, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit 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 28th day of September 2010


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 Proprietary Information from Public Disclosure 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 contained in EQ-QR-64-GEN, Revision 0, "AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations," (Proprietary) dated September 2010, for submittal to the Commission, being transmitted by Tennessee Valley Authority letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with Watts Bar Unit 2 Post Accident Monitoring System and may be used only for that purpose.

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

- (a) Provide similar information to customers for the safe operation of the Post Accident Monitoring Systems and support licensing for these systems.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purpose of failure modes and effects.
- (b) Westinghouse can sell support and defense of licensing of the system.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar analytical reports 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 versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval. The documents are to be considered proprietary in their entirety.

COPYRIGHT NOTICE

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. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

Tennessee Valley Authority

Letter for Transmittal to the NRC

The following paragraphs should be included in your letter to the NRC:

Enclosed are:

1. ___ copies of EQ-QR-64-GEN, Revision 0, "AI687 and AI688 for use in Common Q PAMS EMC Test Report and Installation Limitations" (Proprietary)

Also enclosed is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-10-2904, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice.

As Item 1 contains information proprietary to Westinghouse Electric Company LLC, 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 respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-10-2904 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.

Withhold from Public Disclosure Under 10 CFR 2.390

ENCLOSURE 1

**TVA Letter Dated October 26, 2010
Responses to Licensee Open Items to be Resolved for SER Approval**

Attachment 12

Westinghouse Document Application For Withholding Proprietary Information From
Public Disclosure, EQ-EV-62-WBT, Revision 0,
"TVA/WBT AI687 and AI688, Comparison of Tested Conditions
for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT)
Requirements," (Proprietary), dated October 1, 2010



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

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

Direct tel: (412) 374-4643
Direct fax: (412) 374-3846
e-mail: greshaja@westinghouse.com
Proj letter: WBT-D-2469

CAW-10-2977

October 1, 2010

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: EQ-EV-62-WBT, Rev. 0, "TVA/WBT AI687 and AI688, Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT) Requirements" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-10-2977 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.

The subject document was prepared and classified as Westinghouse Proprietary Class 2. Westinghouse requests that the document be considered proprietary in its entirety. As such, a non-proprietary version will not be issued.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Tennessee Valley Authority.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-10-2977, 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'.

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

Enclosures

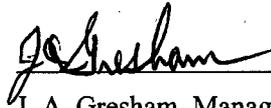
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

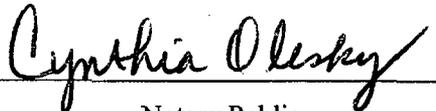
Before me, the undersigned authority, personally appeared J. A. Gresham, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



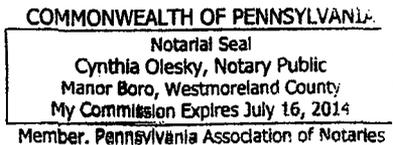
J. A. Gresham, Manager

Regulatory Compliance and Plant Licensing

Sworn to and subscribed before me
this 1st day of October 2010



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 Proprietary Information from Public Disclosure 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 contained in EQ-EV-62-WBT, Rev. 0, "TVA/WBT AI687 and AI688, Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT) Requirements," (Proprietary) dated September 2010, for submittal to the Commission, being transmitted by Tennessee Valley Authority letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with Watts Bar 2 Common Q Modules AI1687 and AI1688 and may be used only for that purpose.

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

- (a) Supply technically qualified Common Q Modules.
- (b) Provide Westinghouse customers with safe and reliable equipment and components.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for the purpose of maintaining Westinghouse-supplied safety systems.
- (b) Westinghouse can sell support and defense of licensing services.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar reports 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 is the proprietary version of a document furnished to the NRC in connection with requests for generic and/or plant-specific review and approval. The document is to be considered proprietary in its entirety.

COPYRIGHT NOTICE

The report transmitted herewith bears a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in this report which is 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. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

Tennessee Valley Authority

Letter for Transmittal to the NRC

The following paragraphs should be included in your letter to the NRC:

Enclosed are:

1. ___ copies of EQ-EV-62-WBT, Rev. 0, "TVA/WBT AI687 and AI688, Comparison of Tested Conditions for the AI687 and AI688 Common Q Modules to the Watts Bar Unit 2 (WBT) Requirements" (Proprietary).

Also enclosed is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-10-2977, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice.

As Item 1 contains information proprietary to Westinghouse Electric Company LLC, 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 respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-10-2977 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.

Withhold from Public Disclosure Under 10 CFR 2.390

ENCLOSURE 1

**TVA Letter Dated October 26, 2010
Responses to Licensee Open Items to be Resolved for SER Approval**

Attachment 13

Westinghouse Document Application For Withholding Proprietary
Information From Public Disclosure EQLR-171, Revision 0,
"Environmental and Seismic Test Report, Analog Input (AI)687
and AI688 Modules and Supporting Components
for use in Common Q PAMS," (Proprietary),
dated September 30, 2010



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

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

Direct tel: (412) 374-4643
Direct fax: (412) 374-3846
e-mail: greshaja@westinghouse.com
Proj letter: WBT-D-2440

CAW-10-2973

September 30, 2010

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: EQLR-171, Revision 0, "Environmental and Seismic Test Report, Analog Input (AI)687 and AI688 Modules and Supporting Components for use in Common Qualified (Common Q) Post Accident Monitoring System (PAMS)" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-10-2973 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.

The subject document was prepared and classified as Westinghouse Proprietary Class 2. Westinghouse requests that this document be considered proprietary in its entirety.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by the Tennessee Valley Authority.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-10-2973, 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'.

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

Enclosures

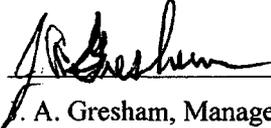
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

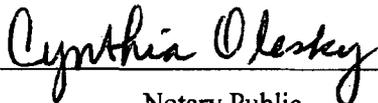
Before me, the undersigned authority, personally appeared J. A. Gresham, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



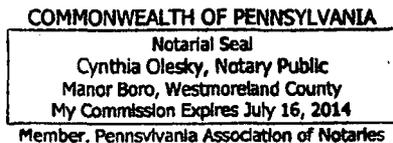
J. A. Gresham, Manager

Regulatory Compliance and Plant Licensing

Sworn to and subscribed before me
this 30th day of September 2010



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 Proprietary Information from Public Disclosure 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 contained in EQLR-171, Revision 0, "Environmental and Seismic Test Report, Analog Input (AI)687 and AI688 Modules and Supporting Components for use in Common Qualified (Common Q) Post Accident Monitoring System (PAMS)," (Proprietary) dated September 2010, for submittal to the Commission, being transmitted by Tennessee Valley Authority letter and Application for Withholding Proprietary Information from Public Disclosure to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with Watts Bar Nuclear Power Plant Unit 2, Post Accident Monitoring System, and may be used only for that purpose.

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

- (a) Provide information in support of plant Post Accident Monitoring system licensing submittals.
- (b) Provide customer specific design information relative to Westinghouse standard platform design.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar systems for similar applications to its customers.
- (b) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.
- (c) The information requested to be withheld reveals the distinguishing aspects of a design which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar designs, calculations, 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.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith is the proprietary version of a document furnished to the NRC in connection with requests for generic and/or plant-specific review and approval. The document is to be considered proprietary in its entirety.

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The report transmitted herewith bears a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in this report which is 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. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

Tennessee Valley Authority

Letter for Transmittal to the NRC

The following paragraphs should be included in your letter to the NRC:

Enclosed are:

1. ___ copies of EQLR-171, Revision 0, "Environmental and Seismic Test Report, Analog Input (AI)687 and AI688 Modules and Supporting Components for use in Common Qualified (Common Q) Post Accident Monitoring System (PAMS)" (Proprietary)

Also enclosed is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-10-2973, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice.

As Item 1 contains information proprietary to Westinghouse Electric Company LLC, 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 respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-10-2973 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.