Florida Power & Light, 9760 S.W. 344 St. Homestead, FL 33035

FPL

OCT 06 2011
L-2011-426
10 CFR 50.90
10 CFR 2.390

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Response to NRC Reactor Systems Branch Request for
Additional Information Regarding Extended Power Uprate
License Amendment Request No. 205

References:

(1) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), "License Amendment Request for Extended Power Uprate (LAR 205)," Accession No. ML103560169, October 21, 2010.

(2) Email from J. Paige (NRC) to S. Hale (FPL), "Turkey Point EPU - Reactor Systems (SRXB) Requests for Additional Information - Round 1.3 (Part 3)," Accession No. ML11202A174, July 21, 2011.

(3) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-233), "Response to NRC Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205 and Reactor Systems Issues," Accession No. ML11221A227, August 5, 2011.

(4) Email from J. Paige (NRC) to S. Hale (FPL), "Turkey Point EPU - Reactor Systems (SRXB) Request for Additional Information - Round 3," Accession No. ML11252B121, September 8, 2011.

(5) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-369), "Response to NRC Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205," Accession No. ML11263A003, September 16, 2011.

By letter L-2010-113 dated October 21, 2010 [Reference 1], Florida Power and Light Company (FPL) requested to amend Renewed Facility Operating Licenses DPR-31 and DPR-41 and revise the Turkey Point Units 3 and 4 (PTN) Technical Specifications (TS). The proposed amendment will increase each unit's licensed core power level from 2300 megawatts thermal (MWt) to 2644 MWt and revise the Renewed Facility Operating Licenses and TS to support operation at this increased core thermal power level. This represents an approximate increase of 15% and is therefore considered an extended power uprate (EPU).

By email dated July 21, 2011 [Reference 2], the Nuclear Regulatory Commission (NRC) Project Manager (PM) issued a Request for Additional Information (RAI) from the NRC Reactor Systems Branch (SRXB) consisting of thirty-nine questions pertaining to the loss of coolant accident (LOCA) and non-LOCA analyses discussed in Reference 1. Question SRXB-1.3.22 requested FPL to identify the basis for the peak cladding temperature (PCT) acceptance criterion used in the Reference 1 Locked Rotor accident analysis. On August 5, 2011, FPL provided its response to RAI questions SRXB-1.3.1-1.3.6 and 1.3.16-1.3.39 via FPL letter L-2011-233 [Reference 3].

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NRR

The NRC PM issued a follow-up RAI consisting of seven additional questions on non-LOCA analysis topics by email dated September 8, 2011 [Reference 4]. Two of these questions concerned the PTN Locked Rotor event: SRXB-3.6 requested additional justification for the analysis prediction of the number of failed fuel rods, and SRXB-3.7 requested FPL to provide supporting documentation concerning the basis of the PCT acceptance criterion. FPL responded to the Reference 4 RAI questions by letter L-2011-369 [Reference 5] dated September 16, 2011.

During a follow-up telephone discussion between FPL and the NRC held on September 21, 2011, the SRXB staff requested additional technical justification for the Locked Rotor analysis failed fuel rod determination and the PCT acceptance criterion. The NRC information request and FPL's response are presented in Attachment 1 (non-proprietary) and Attachment 2 (proprietary) to this letter.

Attachment 3 contains the application for withholding the proprietary information contained in Attachment 2 from public disclosure. As Attachment 2 contains information proprietary to Westinghouse Electric Company, LLC (Westinghouse), it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis for which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of §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 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of items in the response to the RAI questions in Attachment 2 of this letter or the supporting Westinghouse affidavit should reference CAW-11-3258 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, Suite 428, 1000 Westinghouse Drive, Cranberry Township, PA 16066.

In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the State Designee of Florida.

This submittal does not alter the significant hazards consideration or environmental assessment previously submitted by FPL letter L-2010-113 [Reference 1].

This submittal contains no new commitments and no revisions to existing commitments.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Licensing Manager, at (305) 246-7327.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 6, 2011.

Very truly yours,

Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Attachments (3)

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Resident Inspector, Turkey Point Nuclear Plant
Mr. W. A. Passetti, Florida Department of Health (Without Attachment 2)

Turkey Point Units 3 and 4

RESPONSE TO NRC REACTOR SYSTEMS BRANCH REQUEST FOR ADDITIONAL INFORMATION REGARDING EXTENDED POWER UPRATE LICENSE AMENDMENT REQUEST NO. 205

ATTACHMENT 1

(Non-Proprietary)

Response to Request for Additional Information

The following information is provided by Florida Power and Light Company (FPL) in response to the U. S. Nuclear Regulatory Commission's (NRC) Request for Additional Information (RAI). This information was requested to support License Amendment Request (LAR) 205, Extended Power Uprate (EPU), for Turkey Point Nuclear Plant (PTN) Units 3 and 4 that was submitted to the NRC by FPL via letter (L-2010-113) dated October 21, 2010 [Reference 1].

By email dated July 21, 2011 [Reference 2], the NRC Project Manager (PM) issued a RAI from the NRC Reactor Systems Branch (SRXB) consisting of thirty-nine questions pertaining to the loss of coolant accident (LOCA) and non-LOCA analyses discussed in Reference 1. Question SRXB-1.3.22 requested FPL to identify the basis for the peak cladding temperature (PCT) acceptance criterion used in the Reference 1 Locked Rotor accident analysis. On August 5, 2011, FPL provided its response to RAI questions SRXB-1.3.1-1.3.6 and 1.3.16-1.3.39 via FPL letter L-2011-233 [Reference 3].

The NRC PM issued a follow-up RAI consisting of seven additional questions on non-LOCA analysis topics by email dated September 8, 2011 [Reference 4]. Two of these questions concerned the PTN Locked Rotor event: SRXB-3.6 requested additional justification for the analysis prediction of the number of failed fuel rods, and SRXB-3.7 requested FPL to provide supporting documentation concerning the basis of the PCT acceptance criterion. FPL responded to the Reference 4 RAI questions by letter L-2011-369 [Reference 5] dated September 16, 2011.

During a follow-up telephone discussion between FPL and the NRC held on September 21, 2011, the SRXB staff requested additional technical justification for the Locked Rotor analysis failed fuel rod determination and the PCT acceptance criterion. The NRC information request and FPL's response are presented below.

Note: Attachment 1 presents the non-proprietary version of the RAI response. Attachment 2 presents the proprietary version of the RAI response, and Attachment 3 contains the application for withholding the proprietary information contained in Attachment 2 from public disclosure. As Attachment 2 contains information proprietary to Westinghouse Electric Company, LLC (Westinghouse), it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis for which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of §2.390 of the Commission's regulations. The proprietary information in Question 1 is enclosed in brackets and the justification is annotated by means of lower case letters (a) and (c) located as a superscript immediately following the brackets, i.e., [ ]^{a,c}.

Question 1 **Turkey Point predicts [ ]^{a,c} rods in DNB for the Locked Rotor event, while most plants predict a greater degree of fuel failure. Provide additional details demonstrating the fuel failure prediction for the Locked Rotor event at Turkey Point.**

The response to original RAI SRXB-3.6 identified the key changes that provided benefit to the Departure from Nucleate Boiling Ratio (DNBR) performance in the analysis of the Locked Rotor accident such that [ ]^{a,c} fuel rods undergo DNB. A quantified estimate of the DNBR impact of each of the key factors is provided below.

Since the incorporation of Intermediate Flow Mixer (IFM) grids into fuel product designs, it has been Westinghouse's experience that the Locked Rotor analysis may [ ]^{a,c} rods-in-DNB. The Locked Rotor analysis for plants that have implemented the 15x15 Upgrade fuel product has resulted in [ ]^{a,c} failed fuel, as documented in the Final Safety Analysis Reports for such plants. DNBR decreases as fluid proceeds axially up the assembly until the flow encounters a mixing grid. Each mixing grid increases thermal mixing between channels allowing for both enthalpy and flow redistributions within the assembly. Each time the flow encounters mixing, the DNBR increases sharply, followed by another steady decrease to the next grid. The 15x15 Upgrade fuel introduces three IFM grids between the mixing vane grids in the upper region of the core where DNB is typically limiting, decreasing the distance between grids by half. By introducing mixing and reversing the decrease in DNBR at much smaller intervals, the minimum DNBR is significantly increased. The Turkey Point EPU analysis for the reference EPU core is consistent with this experience. Additionally, based on the NRC-approved Westinghouse reload methodology, the Locked Rotor rods-in-DNB analysis is performed for each Turkey Point reload cycle to confirm that the cycle-specific calculation of rods-in-DNB remains less than the 15% value assumed in the radiological dose analysis.

Additional VIPRE calculations have been made, at representative Locked Rotor conditions, to quantify the impacts of each of the previously discussed key factors affecting the DNBR results for the Locked Rotor analysis. Note that the operating conditions affect the sensitivities to various parameters, so these results do not reflect the impact at conditions other than Locked Rotor.

In order to account for the key changes from the existing pre-EPU analysis of record (AOR) to the EPU AOR, the initial VIPRE model was based on Debris-Resistant Fuel Assembly (DRFA) fuel at pre-EPU AOR conditions. This model was modified to obtain the DNBR changes associated with the fuel upgrade (IFMs), the EPU power increase, the $F_{\Delta H}$ reduction for the Upgrade fuel, and the minimum measured flow increase. The results given in Table 1 were obtained by isolating each parameter in question and changing only one variable at a time. The small DNBR benefit from the change to VIPRE as a direct replacement for THINC/FACTRAN described in the original response is not included in Table 1.

Table 1
Approximate DNBR Impacts of Key Parameter Changes at Locked Rotor Conditions

Change Description	% Change in DNBR
Fuel Upgrade Benefit	[ ]^{a,c}
Power Increase Penalty	[ ]^{a,c}
$F_{\Delta H}$ Reduction Benefit	[ ]^{a,c}
Flow Increase Benefit	[ ]^{a,c}
Net change	[ ]^{a,c}

In the pre-EPU AOR for the Locked Rotor analysis of the DRFA fuel, the calculated DNBR is approximately [ ]^{a,c} below the EPU safety analysis limit DNBR. After accounting for all of the changes in Table 1, it is expected that DNBR benefits will more than offset the DNBR deficit incurred due to the increased power for the bounding Upgrade fuel, thus indicating that [ ]^{a,c} rods would experience DNB.

Question 2 **Turkey Point does not appear to be applying the correct acceptance criterion for peak cladding temperature. We estimate that the appropriate acceptance criterion, applicable to ZIRLO clad fuel, is more on the order of 2300 °F.**

The purpose of this response is to present evidence that the high temperature oxidation/embrittlement behavior of ZIRLO® cladding is equivalent to Zircaloy-4 cladding. Since that behavior is equivalent, the 2700°F Zircaloy-4 Peak Cladding Temperature (PCT) Limit for short term events such as reactivity accident and locked rotor events is also applicable to ZIRLO cladding.

The NRC accepted the use of a 2700°F limit for under-cooling events such as locked rotor events in the SER for WCAP-9500 [Reference 6]. References 7 to 10 were sourced for the justification for the 2700°F limit. Later the NRC accepted a PCT limit of 2700°F for ZIRLO cladding in reactivity insertion accident (RIA) events in the SER for WCAP-12610-P-A [Reference 11].

In Reference 11, Westinghouse supplied high temperature oxidation data for ZIRLO cladding obtained at temperatures from 1050°C - 1300°C (1922 – 2372°F). Since that time additional testing is available to support the similarity of ZIRLO and Zircaloy-4 at higher temperatures. In Reference 12, Argonne National Laboratories (ANL) reported in 2002 on their review of high temperature oxidation behavior of zirconium alloys. ANL reviewed the steam oxidation kinetics data for Zircaloy-4, Zircaloy-2, E110, MS, and ZIRLO alloys. They concluded:

> "Based on the data review, it is concluded that all relevant LWR zirconium alloys exhibit about the same weight gain kinetics in the temperature range of 1100-1500 C."

In Reference 13, Westinghouse presented integral test data on high temperature oxidation/embrittlement for both ZIRLO and Zircaloy-4 cladding. That data was obtained from tests conducted over the range of 1500°F (815.6°C) to 2300°F (1260°C). A review of that data concluded that the embrittlement as a function of high temperature oxidation was similar for ZIRLO and Zircaloy-4 cladding.

An integral comparison of ZIRLO cladding high temperature oxidation kinetics with Zircaloy-4 is available from Reference 14. In that program a severe accident test for ZIRLO cladding (Quench 15) was run using a simulated bundle up to a maximum temperature of 2150°K (3411°F) measured at the end of the transient. In post test examination the measured average outer oxide layer of 620 μm was similar to the results from a Zircaloy-4 test (QUENCH06 – Reference 15) of 630 μm. The report concluded:

"In summary, the analyses of the QUENCH-15 test data indicate a similar global bundle behavior as of experiments QUENCH-14 (M5® cladding) and QUENCH-06 (Zircaloy-4 cladding)."

Based on a review of the data presented here, Westinghouse concludes that the high temperature oxidation and embrittlement of ZIRLO cladding is similar to Zircaloy-4 through 2700°F and that the short term PCT limit of 2700°F is also applicable for the locked rotor event for ZIRLO clad fuel rods.

References

1. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), "License Amendment Request for Extended Power Uprate (LAR 205)," Accession No. ML103560169, October 21, 2010.
2. Email from J. Paige (NRC) to S. Hale (FPL), "Turkey Point EPU - Reactor Systems (SRXB) Requests for Additional Information - Round 1.3 (Part 3)," Accession No. ML11202A174, July 21, 2011.
3. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-233), "Response to NRC Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205 and Reactor Systems Issues," Accession No. ML11221A227, August 5, 2011.
4. Email from J. Paige (NRC) to S. Hale (FPL), "Turkey Point EPU - Reactor Systems (SRXB) Request for Additional Information - Round 3," Accession No. ML11252B121, September 8, 2011.
5. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-369), "Response to NRC Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205," Accession No. ML11263A003, September 16, 2011.
6. WCAP-9500-A, Reference Core Report, 17x17 Optimized Fuel Assembly, May 1982.
7. S. Shiozawa, et al., "Evaluation on Oxidation of Zircaloy-4 Cladding During Rapid Transient in NSRR Experiments," JAERI-M-8187, March 1979.
8. T. Hoshi, et al., "Fuel Failure Behavior of PCI-Remedy Fuels Under Reactivity Initiated Accident Conditions," JAERI-M-8836, May 1980.
9. "Semi-annual Program Report on the NSRR Experiments-July to December 1979," JAERI-M-9011, September 1980.
10. T. Fujishiro. et al., "The Influence of Coolant Flow on Fuel Behavior Under Reactivity Initiated Accident Conditions," JAERI-M-9104,October 1980.
11. WCAP-12610-P-A, VANTAGE+ Fuel Assembly Reference Core Report, April 1995.
12. M.C. Billone, H.M. Chung, and Y. Yan, "STEAM OXIDATION KINETICS OF ZIRCONIUM ALLOYS," ML021680052, with transmittal letter - S105158, 6/11/2002.
13. W. J. Leech, "Ductility Testing of Zircaloy-4 and ZIRLO™ Cladding after High Temperature Oxidation in Steam," Procs. Topical Meeting on LOCA Fuel Safety Criteria, Aix-en-Provence, 22-23 March, 2001, pp 135-143.

14. Stuckert, J. Große, M. Stegmaier, U. Steinbrück, M., Results of Severe Fuel Damage Experiment QUENCH-15 with ZIRLO cladding tubes. (KIT Scientific Reports ; 7576), 2011, ISBN 978-3-86644-670-0.

15. L. Sepold, W. Hering, C. Homann, A. Miassoedov, G. Schanz, U. Stegmaier, M. Steinbrück, H. Steiner, J. Stuckert, Experimental and Computational Results of the QUENCH-06 Test, FZKA 6722. (OECD ISP-45), 2002.

Turkey Point Units 3 and 4

RESPONSE TO NRC REACTOR SYSTEMS BRANCH REQUEST FOR ADDITIONAL INFORMATION REGARDING EXTENDED POWER UPRATE LICENSE AMENDMENT REQUEST NO. 205

ATTACHMENT 3

Westinghouse Affidavit for Attachment 2
October 5, 2011

This coversheet plus 8 pages

Westinghouse Electric Company
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Proj letter: FPL-11-253

CAW-11-3258

October 5, 2011

APPLICATION FOR WITHHOLDING PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE

Subject: FPL-11-253 P-Attachment, "Turkey Point Units 3 and 4 – Response to Informal NRC Request for Additional Information (RAI) from the Reactor Systems Branch (SRXB) Related to Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 (TAC Nos. ME 4907 and ME 4908)" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-11-3258 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 Florida Power and Light.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-11-3258, and should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company LLC, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,

J. A. Gresham, Manager
Regulatory Compliance

Enclosures

CAW-11-3258

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

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

Sworn to and subscribed before me
this 5th day of October 2011

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, 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 FPL-11-253 P-Attachment, "Turkey Point Units 3 and 4 – Response to Informal NRC Request for Additional Information (RAI) from the Reactor Systems Branch (SRXB) Related to Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 (TAC Nos. ME 4907 and ME 4908)" (Proprietary) for submittal to the Commission, being transmitted by Florida Power and Light letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse for use by Turkey Point Units 3 and 4 is expected to be applicable for other licensee submittals in response to certain NRC requirements for Extended Power Uprate submittals and may be used only for that purpose.

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

(a) Provide input to the U.S. Nuclear Regulatory Commission for review of the Turkey Point EPU submittals.

(b) Provide DNBR impacts at locked rotor conditions.

(c) Provide licensing support for customer submittals.

Further this information has substantial commercial value as follows:

(a) Westinghouse plans to sell the use of the information to its customers for the purpose of meeting NRC requirements for licensing documentation associated with EPU submittals.

(b) Westinghouse can sell support and defense of the technology to its customer in licensing process.

(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 information and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

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

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

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

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

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

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