



Rolls-Royce

Rolls-Royce
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November 18, 2011

U.S. Nuclear Regulatory Commission
 Document Control Desk
 11555 Rockville Pike
 Rockville, MD 20852

ATTENTION: To whom it may concern

SUBJECT: Rolls-Royce submittal of new **SPINLINE 3** licensing documents

- REFERENCES: (1) Project Number 0773: **SPINLINE 3** Digital Safety Instrumentation and Control Platform (TAC No. ME3600)
 (2) Rolls-Royce letter dated September 15, 2011, "Rolls-Royce submittal of new **SPINLINE 3** licensing documents"

Rolls-Royce met with the NRC on August 25, 2011 to discuss the status of the SPINLINE 3 equipment qualification program. The primary purpose of the meeting was for Rolls-Royce to provide an overview of the SPINLINE 3 qualification testing program, discuss the qualification testing status and results, and present the path forward to complete the equipment qualification program. In Reference 2, Rolls-Royce committed to provide the Summary Equipment Qualification Test Report for the Generic **SPINLINE 3** Digital Safety I&C Platform by November 18, 2011.

Rolls-Royce hereby submits the following documents in connection with the referenced NRC project.

Document Title	Rolls-Royce Document Number	Versions: Proprietary (P), Non-proprietary (NP)	Notes
Summary Equipment Qualification Test Report	3 014 545 A	P	New document
Summary Equipment Qualification Test Report	3 014 545A - NP	NP	New document

All documents are submitted electronically.

Rolls-Royce requests that the proprietary document be withheld from public disclosure. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding", an affidavit is enclosed identifying the specific portions of the above documents that are proprietary and the basis for making that determination. A non-proprietary version is submitted.

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 NRC



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If you have any questions related to this submittal, please contact me at 423-756-9730 extension 12 or by e-mail at mark.j.burzynski@ds-s.com.

Sincerely,

A handwritten signature in cursive script that reads "Mark J. Burzynski".

Mark J. Burzynski
US I&C Licensing Manager
Rolls-Royce

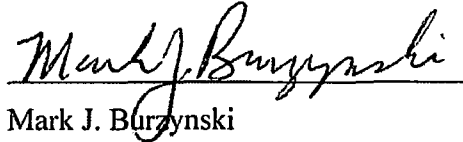


Affidavit

STATE OF TENNESSEE)
)
)
COUNTY OF HAMILTON)


1. In accordance with 10 CFR 2.390, “Public inspections, exemptions, requests for withholding”, Rolls-Royce requests withholding from public disclosure of the documents listed in Table 1, which is attached to this affidavit.
2. I am familiar with the criteria applied by Rolls-Royce to determine whether certain Rolls-Royce information is proprietary. I am familiar with the policies established by Rolls-Royce to ensure the proper application of these criteria.
3. As required by 10 CFR 2.390, Rolls-Royce has included in Table 1 the following information:
 - Identity of the document or part sought to be withheld;
 - Declaration of the basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a);
 - Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public; and
 - Locations in the documents of all information sought to be withheld.
4. As required in § 2.390(b)(4); Rolls-Royce wishes to note that the request for withholding from public disclosure applies to pages that contain commercially sensitive information that Rolls-Royce normally discloses only under a Non-Disclosure Agreement (NDA). This commercially sensitive information is not available in public sources and is the type of information customarily held in confidence by Rolls-Royce and our competitors.

5. Rolls-Royce is transmitting this information to NRC in confidence.
6. As noted in Table 1, release of this information in a public forum could cause harm to Rolls-Royce by revealing trade secrets and/or commercially sensitive design and operational details and technical processes related to designing, building, and/or operating a *SPINLINE 3* digital safety instrumentation and control system.
7. As Rolls-Royce US I&C Licensing Manager, I have been specifically delegated responsibility for reviewing the information sought to be withheld, and I am authorized to apply for its withholding on behalf of Rolls-Royce.
8. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

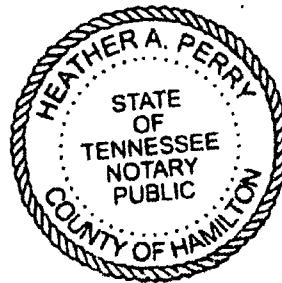


Mark J. Burzynski
US I&C Licensing Manager
Rolls-Royce

Sworn to and subscribed before me
this 17th day of November, 2011.



Notary Public



My Commission Expires September 4, 2013

My commission expires: 9/4/2013

Table 1. Documents requested for withholding from public disclosure

Document Title	Document Number	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public	Location(s) in the document of all information sought to be withheld
<p>Summary Equipment Qualification Test Report for the Generic SPINLINE 3 Digital Safety I&C Platform</p>	<p>3 014 545 A</p>	<p>Table and portions of Appendices A to M, as marked by brackets [[]].</p>	<p>Trade secrets and / or commercial information as per § 2.390(a)(4)</p>	<p>Rolls-Royce would be harmed by disclosure of aspects of the identified commercially sensitive information, which is of value to a competitor because it would enable them to make direct comparisons between the qualification processes and qualification envelopes for their safety I&C platform and the corresponding details for SPINLINE 3.</p> <p>The specified EQ Summary Report table and the appendices define the specific qualification envelope and test processes applied to SPINLINE 3 hardware.</p>	<p>Some or all of the following Table and Sections in the appendices as marked by brackets [[]]: Table 13-1 A.7 and A.8 B.7 and B.12 C.2, C.6, C.7, C.8, C.9, C.12 and C.13 D.2, D.7, D.8, D.9, D.12 and D.13 E.4, E.5, E.7, E.8, E.9, E.12 and E.13 F.6, F.7, F.8, F.9, F.10, F.12 and F.13 G.6, G.7, G.8, G.9, G.10, G.12 and G.13 H.6, H.7, H.8, H.9, H.10, H.12 and H.13 I.6, I.7, I.8, I.9, I.10, I.12 and I.13 J.6, J.7, J.8, J.9, J.10, J.12 and J.13 K.7, K.12 and K.13</p>