



Proprietary Information – Withhold From Public Disclosure Under 10 CFR 2.390
The balance of this letter may be considered non-proprietary upon removal of
Attachment 1.

July 6, 2012

L-2012-277
10 CFR 50.90
10 CFR 2.390

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

Re: St. Lucie Plant Unit 2
Docket No. 50-389
Renewed Facility Operating License No. NPF-16

Supplemental Information Related to the Response to NRC Reactor System
Branch and Nuclear Performance Branch Request for Additional Information
Regarding Extended Power Uprate License Amendment Request

References:

- (1) R. L. Anderson (FPL) to U.S. Nuclear Regulatory Commission (L-2011-021),
“License Amendment Request for Extended Power Uprate,” February 25, 2011,
Accession No. ML110730116.
- (2) R. L. Anderson (FPL) to U.S. Nuclear Regulatory Commission (L-2011-533),
“Response to NRC Reactor System Branch and Nuclear Performance Branch
Request for Additional Information Regarding Extended Power Uprate License
Amendment Request,” December 29, 2011, Accession No. ML12004A088.

By letter L-2011-021 dated February 25, 2011 [Reference 1], Florida Power & Light Company (FPL) requested to amend Renewed Facility Operating License No. NPF-16 and revise the St. Lucie Unit 2 Technical Specifications (TS). The proposed amendment will increase the unit’s licensed core thermal power level from 2700 megawatts thermal (MWt) to 3020 MWt and revise the Renewed Facility Operating License and TS to support operation at this increased core thermal power level. This represents an approximate increase of 11.85% and is therefore considered an extended power uprate (EPU).

By Reference 2, FPL submitted a response to Request for Additional Information (RAI) SRXB-92 related to peak cladding temperature decrease for the large break loss of coolant accident (LBLOCA) analysis at EPU conditions. Per telecon with the NRC Project Manager on June 26, 2012, FPL is providing supplemental information to support its response to RAI SRXB-92.

A002
NRC

Attachment 1 (proprietary) to this letter contains a discussion of the discretionary conservatism used in the EPU LBLOCA analysis. Attachment 2 contains the non-proprietary version.

Attachment 3 contains a copy of the Proprietary Information Affidavit. The purpose of this attachment is to withhold the proprietary information contained in Attachment 1 from public disclosure. The Affidavit signed by Westinghouse as the owner of the information 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.

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

This submittal does not alter the significant hazards consideration or environmental assessment previously submitted by FPL letter L-2011-021 [Reference 1].

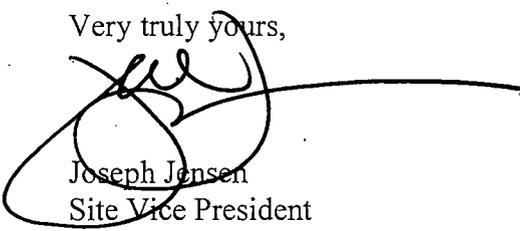
This submittal contains no new commitments and no revisions to existing commitments.

Should you have any questions regarding this submittal, please contact Mr. Jack Hoffman, St. Lucie Extended Power Uprate LAR Project Manager, at 772-467-7493.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on July 6, 2012

Very truly yours,



Joseph Jensen
Site Vice President
St. Lucie Plant

Attachments (3)

cc: Ms Cynthia Becker, Florida Department of Health

Attachment 2
Effect of Discretionary Conservatism on
St. Lucie Unit 2 Extended Power Uprate (EPU)
Large Break Loss of Coolant Accident (LBLOCA) Analysis

Discretionary Conservatism on the Reflood Heat Transfer Coefficients

Discretionary conservatism is defined as conservatism that is added to an analysis to provide additional margin. It is not required by the approved analysis methodology. Consequently, it may be decreased or removed in future revisions of the analysis or in future work that builds on the analysis. It is also available to trade-off against the impact that future changes may have on the results of the analysis. Discretionary conservatism is typically incorporated in LBLOCA analyses through:

(a) []^{a,c}

(b) []^{a,c}

A description of the input options is described in Table A-1 "User Control Interface (UCI) Input Variables" of CENPD-132, Supplement 4-P-A.

A comparison of the discretionary conservatisms applied to the EPU and analysis of record (AOR) analyses showed that the AOR analysis has greater conservatisms applied to []^{a,c}

The effects of discretionary conservatisms (a) and (b) are to []^{a,c}

Discretionary Conservatism Values Used in the AOR

The AOR used the following input values for the calculation of discretionary conservatism:

i. []^{a,c}

ii. []^{a,c}

Discretionary Conservatism Values Used in the EPU Analysis.

The EPU analysis used the following input values for the calculation of discretionary conservatism:

i. []^{a,c}

ii. []^{a,c}

Impact on PCT from the Change in Discretionary Conservatism Between the AOR and EPU

Response to RAI SRXB-92 (submitted by FPL letter L-2011-533, Accession No. ML12004A088) documented that the PCT delta benefit resulting from the change in discretionary conservatism is of the order of a []^{a,c}

Impact on the FLECHT Cooling Heat Transfer Coefficients

[]^{a,c}

Impact on the Steam Cooling Heat Transfer Coefficients

[]^{a,c}

Figure 1
[

]a,c

Figure 2
[

]a.c

ATTACHMENT 3

**Supplemental Information Related to the Response to
NRC Reactor System Branch and Nuclear Performance Branch
Request for Additional Information Regarding
Extended Power Uprate License Amendment Request**

**Westinghouse Electric Company
Affidavit to Withhold Proprietary Information
from Public Disclosure**

This coversheet plus 7 pages



Westinghouse Electric Company
Nuclear Services
1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066
USA

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

Direct tel: (412) 374-4643
Direct fax: (724) 720-0754
e-mail: greshaja@westinghouse.com
Proj letter: FPL-12-183

CAW-12-3507

June 29, 2012

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: P-Attachment to FPL-12-183, "Effect of Discretionary Conservatism on St. Lucie Unit 2 Large Break LOCA" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-12-3507 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 CAW-12-3507 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. A. Gresham', written over a printed name and title.

J. A. Gresham, Manager
Regulatory Compliance

Enclosures

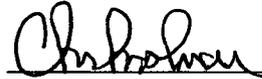
AFFIDAVIT

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, Principal Engineer
Regulatory Compliance

Sworn to and subscribed before me
this 29th day of June 2012



Notary Public

My commission expires: 8/31/2014

- (1) I am Principal Engineer, 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 the response to the NRC's question, "Effect of Discretionary Conservatism on St. Lucie Unit 2 Large Break LOCA" (Proprietary), for submittal to the Commission, being transmitted by Florida Power and Light (FPL) 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 St. Lucie Unit 2 Extended Power Uprate (EPU), and may be used only for that purpose.

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

- (a) Support FPL's St. Lucie Unit 2 EPU license amendment request

Further this information has substantial commercial value as follows:

- (b) 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 technical evaluation justifications 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 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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