



Rolls-Royce

Rolls-Royce

5959 Shallowford Road, Suite 511
Chattanooga, Tennessee 37421
www.rolls-royce.com

December 18, 2012

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 to NRC, "Rolls-Royce submittal of new **SPINLINE 3** licensing documents", dated September 15, 2011
 - (3) Rolls-Royce Letter to NRC, "Rolls-Royce submittal of new **SPINLINE 3** licensing documents", dated September 21, 2012
 - (4) Rolls-Royce Letter to NRC, "Rolls-Royce Response to Request for Additional Information Re: Rolls-Royce Civil Nuclear '**SPINLINE 3** Digital Safety Instrumentation and Control Platform' Topical Report (TAC NO. ME3600)", dated December 21, 2011
 - (5) Rolls-Royce Letter to NRC, "Rolls-Royce Response to Request for Additional Information (Set 2) Re: Rolls-Royce Civil Nuclear '**SPINLINE 3** Digital Safety Instrumentation and Control Platform' Topical Report (TAC NO. ME3600)", dated August 3, 2012

In Reference 2, Rolls-Royce provided a schedule for the supplemental qualification testing program. Rolls-Royce committed to send the Supplemental Test Plan and Procedures along with a summary of the resolution of test deficiencies. In Reference 3, Rolls-Royce committed to update the **SPINLINE 3** documents to be consistent with the final qualification test results. In addition, the Rolls-Royce incorporated the applicable parts of the responses to NRC requests for additional information provided in References 4 and 5 into the Licensing Topical Report.

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

4601
NRC

Document Title	Rolls-Royce Document Number	Versions: Proprietary (P), Non-proprietary (NP)	Notes
Licensing Topical Report (LTR)	3 008 503 D	P	Replaces 3 008 503 C submitted January 31, 2011
	3 008 503D-NP	NP	Replaces 3 008 503C-NP submitted January 31, 2011
Summary Equipment Qualification Test Report	3 014 545 C	P	Replaces 3 014 545 B submitted May 31, 2012
	3 014 545C-NP	NP	Replaces 3 014 545B-NP submitted May 31, 2012
Dedication Report for the Generic SPINLINE 3 Digital Safety I&C Platform	3 010 795 B	Proprietary	Replaces 3 010 795 A submitted June 30, 2011
	3 010 795B-NP	Non-Proprietary	Replaces 3 010 795A-NP submitted June 30, 2011
EPRI TR-106439 Critical Characteristics and EPRI TR- 107330 Compliance Matrix Assessment Report	3 018 281 B	P	Replaces 3 018 281 A submitted March14, 2012
	3 018 281B-NP	NP	Replaces 3 018 281A-NP submitted March14, 2012
Setpoint Analysis Support	3 009 397 B	P	Replaces 3 009 397 A submitted July 1, 2009

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. Non-proprietary version of Rolls-Royce documents 3 008 503D-NP, 3 014 545C-NP, 3 010 795B-NP, and 3 018 281B-NP are also provided with the proprietary information redacted.

Nonproprietary versions of the other Rolls-Royce documents are not provided based on the guidance in NRC Information Notice (IN) 2009-07. As noted in IN 2009-07, in instances in which a nonproprietary version would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted.

All documents are submitted by hard copy mail.

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,


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



Rolls-Royce

Rolls-Royce Civil Nuclear US
5959 Shallowford Road, Suite 511
Chattanooga, Tennessee 37421
Tel: (423) 756-9730
www.rolls-royce.com

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

Mark J. Burzynski

US I&C Licensing Manager

Rolls-Royce

Sworn to and subscribed before me

this 18th day of December, 2012

Whitney D. Hickman

Notary Public

My commission expires: July 21st, 2015



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 (Notes 1 and 2)
Licensing Topical Report (LTR)	3 008 503 D	Portions of Chapters 4, 5, 6, Appendix A and Appendix B, as marked by brackets [[]].	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of the identified commercially sensitive information, which is of value to a competitor because it would enable them to make direct comparisons between aspects of their safety I&C platform and life cycle processes and the corresponding details for SPINLINE 3 . Chapter 4: Rolls-Royce would be harmed by disclosure of commercially sensitive details of how the generic hardware and software components of a SPINLINE 3 system work, and how functions such as data communications and automated testing are implemented. This would be of value to a competitor in understanding specific competitive design and operational characteristics of SPINLINE 3 systems.	In Chapter 4: portions of Section 4.2.4.1, 4.2.4.2, 4.2.5, 4.3.2.3, 4.3.4.1, 4.3.4.2, 4.3.4.3, 4.3.4.4, 4.3.4.5, 4.3.4.6, 4.3.4.7, 4.3.4.8, 4.4.3.2, 4.4.3.4, 4.4.3.5, 4.4.3.6, 4.4.4.3, 4.5.2.1, 4.5.3, 4.5.4.2, 4.5.4.3, 4.5.5.2, 4.5.6, 4.5.7, 4.6.5, 4.6.7, 4.6.8.1, 4.6.8.2.1, 4.6.8.2.2, 4.6.8.2.3, 4.6.8.3, 4.6.8.4, 4.6.10.1, 5.1.2.5, 5.2.1.6, 5.1.2.9, 5.1.3, 5.2.1.5, 6.2.2.8, 6.2.5, 6.2.10, 6.4, 6.4.5, Appendix A, and Appendix B, as marked by brackets [[]].

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 (Notes 1 and 2)
Summary Equipment Qualification Test Report	3 014 545 C	Portions of Table 14-1, Section 15, and Appendices A to K, as marked by brackets [[]].	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of the identified commercially sensitive information, which is of value to a competitor because it defines the specific qualification envelope and test processes applied to SPINLINE 3 , which 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>Some or all of the following table and Sections in the appendices as marked by brackets [[]]:</p> <ul style="list-style-type: none"> • Table 14-1 • 15 • A.7 to A.8 • B.7 and B.12 • C.2, C.6 to C.9, and C.12 to C.13 • D.2, D.7 to D.9, and D.12 to D.13 • E.4, E.5, E.7 to E.9, and E.12 to E.13 • F.2, F.6 to F.10, , and F.12 to F.13 • G.6 to G.10 and G.12 to G.13 • H.6 to H.10 and H.12 to H.13 • I.6 to I.10 and I.12 to I.13 • J.6 to J.10 and J.12 to J.13 • K.7 and K.12 to K.13

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 (Notes 1 and 2)
Dedication Report for the Generic SPINLINE 3 Digital Safety I&C Platform	3 010 795 B	Table A-1: Appendix A: Compliance with the Dedication Process Defined in EPRI TR-106439 and Appendix B: SPINLINE 3 platform dedication audit report	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of aspects of its proprietary technical processes for safety software development and verification and validation. These processes underpin the integrity of SPINLINE 3 software, which is an important competitive advantage for Rolls-Royce.	Table A-1 and Appendix B
EPRI TR-106439 Critical Characteristics and EPRI TR-107330 Compliance Matrix Assessment Report	3 018 281 B	Portions of response, as marked by brackets [[]].	Trade secrets and / or commercial information as per § 2.390(a)(4)	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 design features, equipment qualification processes, and commercial grade dedication methods for their SPINLINE 3 safety I&C platform.	Portions of Sections 2 and 4 as marked by brackets [[]]:

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 (Notes 1 and 2)
Setpoint Analysis Support	3 009 397 B	Entire document (see Note 2).	Trade secrets and / or commercial information as per § 2.390(a)(4)	Rolls-Royce would be harmed by disclosure of the commercially sensitive details on the characteristics of SPINLINE 3 hardware related to establishing system setpoints. This would be of value to a competitor in understanding specific competitive design and operational characteristics of SPINLINE 3 systems.	Entire document (see Note 2).

Notes:

- (1) As required in NRC Information Notice (IN) 2009-07, documents containing proprietary information are marked with the word "Proprietary" at the top of the first page of the document and at the top of each page containing such information. In proprietary documents, brackets ("[[]]") denote proprietary information. In the proprietary document, the two brackets denoting the end of a proprietary segment of a report may appear one or more pages following the bracket indicating the start of the proprietary segment. In a nonproprietary edition of a proprietary document, the material within the brackets is removed.
- (2) As noted in IN 2009-07, in instances in which a nonproprietary version would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted.