



Project ~~649~~ 694

January 30, 2013

OG-13-20

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

Subject: PWR Owners Group
For Information Only – WCAP 17601-P, Revision 1 “Reactor Coolant System Response to the Extended Loss of AC Power Event for Westinghouse, Combustion Engineering and Babcock & Wilcox NSSS Designs” and “PWROG Core Cooling Position Paper”, Revision 0 (PA-ASC-0916 and PA-PSC-0965)

This letter transmits two documents for information only. The two documents are as follows:

1. WCAP 17601-P, Revision 1 “Reactor Coolant System Response to the Extended Loss of AC Power Event for Westinghouse, Combustion Engineering and Babcock & Wilcox NSSS Designs (Enclosure 1), and
2. PWROG Core Cooling Position Paper, Revision 0, November 2012, PA-PSC-0965, OG-13-26 (Enclosure 2).

The PWROG agreed to provide WCAP-17601 to the NRC as indicated in the summary of the public meeting on November 16, 2012 (NRC Adams Number ML12325A094). The PWROG subsequently agreed to provide the PWROG Core Cooling Position Paper in a telecon with the NRC Staff on December 6.

It is the understanding of the PWROG that the NRC staff plans to use contractors to review licensee submittals due February 28, 2013 that respond to NRC Order EA-12-049. Further, the PWROG understands that the NRC Staff plans to perform an informal review of the material in these documents from which they will establish guidance for NRC contractors for review of the licensee submittals. This will enable the review process to be consistent and objective.

The documents submitted herein were never intended for NRC review and approval, and no NRC review is being requested by the PWROG pursuant to this submittal. These documents are being submitted for information only in support of NRC staff efforts to provide guidance to NRC contractors for review of licensee submittals as discussed above. Therefore, the PWROG expects no NRC review fees. This is consistent with the language of 10 CFR 170.11(a)(1)(iii)(A) and (B).

D048
NRR

Also enclosed are the Westinghouse Applications for Withholding Proprietary Information from Public Disclosure, CAW-13-3589 and CAW-13-3594, (Enclosures 3 and 4) accompanying affidavit, Proprietary Information Notice, and Copyright Notice. The report and white paper contain information proprietary to Westinghouse Electric Company LLC; it is supported by an affidavit signed by Westinghouse, 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 this 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 information listed above or supporting Westinghouse affidavits should reference CAW-13-3589 and CAW-13-3594 and should be addressed to:

J. A. Gresham, Manager, Regulatory Compliance
Westinghouse Electric Company
Suite 428, 1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066

Enclosures include:

1. One copy of WCAP 17601-P, Revision 1, "Reactor Coolant System Response to the Extended Loss of AC Power Event for Westinghouse, Combustion Engineering and Babcock & Wilcox NSSS Designs" (PA-ASC-0916) (Proprietary).
2. One copy of "PWROG Core Cooling Position Paper", Revision 0, November 2012, PA-PSC-0965, OG-13-26 (Proprietary).
3. One copy of the Application for Withholding, CAW-13-3589 (Non-proprietary) with accompanying Affidavit, Proprietary Information Notice and Copyright Notice.
4. One copy of the Application for Withholding, CAW-13-3594 (Non-proprietary) with accompanying Affidavit, Proprietary Information Notice and Copyright Notice.

Correspondence related to this transmittal, including requests for additional information, should be addressed to:

Mr. W. Anthony Nowinowski, Program Manager
PWR Owners Group, Program Management Office
Westinghouse Electric Company
Suite 380, 1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066

If you have any questions, please do not hesitate to contact me at (205) 992-7037 or Mr. W. Anthony Nowinowski at (412) 374-6855.

Sincerely,



Jack Stringfellow, Chairman
PWR Owners Group

NJS:JPM:las

Enclosures: (2) Affidavits - CAW-13-3594 and CAW-13-3589
WCAP-17601-P, Revision 1
Letter OG-13-26

cc:	PWROG Management Committee	J. Gresham, W
	PWROG Steering Committee	J. Bosma, W
	Analysis Subcommittee	J. McFadden, W
	Procedures Subcommittee	K. Flute, W
	K. Gates, W	J. Rowley, NRC
	J. Hartz, W	J. Kratchman, NRC
	R. Span, W	



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

CAW-13-3589

January 15, 2013

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

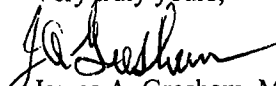
Subject: WCAP-17601-P, Revision 1, "Reactor Coolant System Response to the Extended Loss of AC Power Event for Westinghouse, Combustion Engineering and Babcock & Wilcox NSSS Designs" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-13-3589 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 Pressurized Water Reactor Owners Group (PWROG).

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference CAW-13-3589 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,

James A. Gresham, Manager
Regulatory Compliance

Enclosures

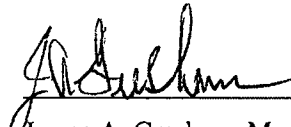
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

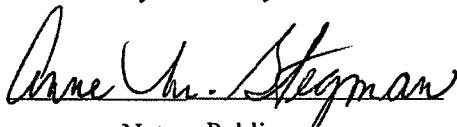
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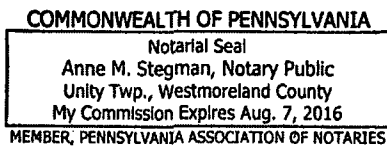
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared James 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:


James A. Gresham, Manager
Regulatory Compliance

Sworn to and subscribed before me
this 15th day of January 2013


Notary Public



- (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 WCAP-17601-P, Revision 1, "Reactor Coolant System Response to the Extended Loss of AC Power Event for Westinghouse, Combustion Engineering and Babcock & Wilcox NSSS Designs" (Proprietary), dated January 2013, for submittal to the Commission, being transmitted by PWROG letter OG-13-20 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's request for a copy of WCAP-17601-P, Revision 1 for informational purposes only, and may be used only for that purpose.

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 is the proprietary version of a document furnished to the NRC in connection with requests for informational use only. 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.

PWROG

Letter for Transmittal to the NRC

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

Enclosed is:

1. 1 copy of WCAP-17601-P, Revision 1, "Reactor Coolant System Response to the Extended Loss of AC Power Event for Westinghouse, Combustion Engineering and Babcock & Wilcox NSSS Designs" (Proprietary)

Also enclosed is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-13-3589, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice.

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.

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-13-3589 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.



Program Management Office
20 International Drive
Windsor, CT 06095

January 25, 2013

OG-13-26

To: PWROG Procedures Subcommittee Members
PWROG Analysis Subcommittee Members

Subject: PWR Owners Group
Transmittal of PWROG Core Cooling Position Paper, Revision 0, November 2012, PA-PSC-0965

References: **Transmittal of LTR-PCSA-12-78, "Transmittal of PA-PSC-0965 Core Team PWROG Core Cooling Management Interim Position Paper, PA-PSC-0965, OG-12-482, November 12, 2012"**

The purpose of this letter is to transmit "PWROG Core Cooling Position Paper, Revision 0, November 2012" (PA-PSC-0965) for your information only and no review is required.

The PWROG agreed to provide WCAP-17601 to the NRC as indicated in the summary of the public meeting on November 16, 2012 (NRC Adams Number ML12325A094). The PWROG subsequently agreed to provide the PWROG Core Cooling Position Paper in a telecon with the NRC Staff on December 6. The white paper will be submitted to the NRC for their information only under a different cover letter. The documents will be provided to the Staff for information only and no review will be requested and therefore no review fees will be anticipated.

It is the PWROG's understanding that the NRC plans to use contractors to review licensee submittals due February 28, 2013 that respond to NRC Order EA-12-049. Further, the PWROG understands that the NRC Staff plans to perform an informal review of the material in these documents from which they will establish guidance for NRC contractors for review of the licensee submittals. This will enable the review process to be consistent and objective.

Please note that the attached document is the property of and contains Proprietary Information owned by Westinghouse Electric Company LLC and/or its subcontractors and suppliers. It is transmitted to you in confidence and trust, and you agree to treat this document in strict accordance with the terms and conditions of the agreement under which it was provided to you.

If you have any questions, please feel free to give me a call at (860) 731-6727.

Sincerely,

Jim Molkenthin, Project Manager
PWR Owners Group
Program Management Office

JPM:las

Attachment (1)

cc: PWROG PMO
D. Roehlich, W
J. McFadden, W
J. Bosma, W
J. Stringfellow, SNC
K. Flaig, Dominion
J. Thomas, Duke
R. Linthicum, Exelon
P. Dellarco, Dominion



Westinghouse Electric Company
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Cranberry Township, Pennsylvania 16066
USA

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

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

CAW-13-3594
January 28, 2013

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: OG-13-26, "Transmittal of PWROG Core Cooling Position Paper, Revision 0,
November 2012, PA-PSC-0965 (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-13-3594 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 Pressurized Water Reactor Owners Group (PWROG).

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference CAW-13-3594 and should be addressed to James 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 "James A. Gresham".

James A. Gresham, Manager
Regulatory Compliance

Enclosures

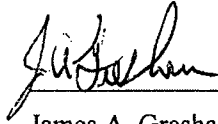
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

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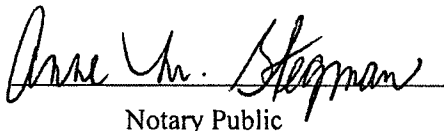
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared James 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:

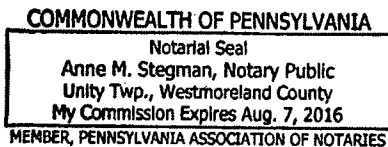


James A. Gresham, Manager
Regulatory Compliance

Sworn to and subscribed before me
this 28th day of January 2013



Notary Public



- (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.
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 - (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.
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- (f) It contains patentable ideas, for which patent protection may be desirable.

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- (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.

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- (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 OG-13-26, "Transmittal of PWROG Core Cooling Position Paper, Revision 0, November 2012, PA-PSC-0965 (Proprietary), for submittal to the Commission, 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's request for a copy of PWROG Core Cooling Position Paper for informational purposes and may be used only for that purpose.

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.

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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 PWROG Core Cooling Position Paper for information and may be used only for that purpose. 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.