

October 30, 2013

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

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE FOR WESTINGHOUSE REPORTS: (1) APP-OCS-GEH-320 REVISION 3, "HUMAN FACTORS ENGINEERING INTEGRATED SYSTEM VALIDATION PLAN (PROPRIETARY), (2) APP-OCS-GEH-120 REVISION 1, "HUMAN FACTORS ENGINEERING DESIGN VERIFICATION PLAN (PROPRIETARY), (3) APP-OCS-GEH-220 REVISION 1, HUMAN FACTORS ENGINEERING TASK SUPPORT VERIFICATION PLAN (PROPRIETARY), (4) APP-OCS-GEH-420 REVISION 1, HUMAN FACTORS ENGINEERING DISCREPANCY RESOLUTION PROCESS (PROPRIETARY), (5) APP-OCS-GEH-520 REVISION 2, PLANT STARTUP HUMAN FACTORS ENGINEERING DESIGN VERIFICATION PLAN (PROPRIETARY)

Dear Mr. Gresham:

By letters dated August 14, 2013 (CAW-13-3774, CAW-13-3770, CAW-13-3772, CAW-13-3776, and CAW-13-3778), Westinghouse Electric Company, LLC (Westinghouse) submitted affidavits dated August 14, 2013, executed by Robert B. Sisk, which requested that the information contained in the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

- (1) APP-OCS-GEH-320 REVISION 3, "HUMAN FACTORS ENGINEERING INTEGRATED SYSTEM VALIDATION PLAN" (PROPRIETARY)
- (2) APP-OCS-GEH-120 REVISION 1, "HUMAN FACTORS ENGINEERING DESIGN VERIFICATION PLAN" (PROPRIETARY)
- (3) APP-OCS-GEH-220 REVISION 1, "HUMAN FACTORS ENGINEERING TASK SUPPORT VERIFICATION PLAN" (PROPRIETARY)
- (4) APP-OCS-GEH-420 REVISION 1, "HUMAN FACTORS ENGINEERING DISCREPANCY RESOLUTION PROCESS" (PROPRIETARY)
- (5) APP-OCS-GEH-520 REVISION 2, "PLANT STARTUP HUMAN FACTORS ENGINEERING DESIGN VERIFICATION PLAN" (PROPRIETARY)

A nonproprietary copy of each of the documents has been placed in the Nuclear Regulatory Commission's (NRC) Public Document Room and added to the NRC Library in the Agencywide Documents Access and Management System.

The affidavits stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (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 data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secure a competitive economic advantage, e.g., by organization or improved marketability.
- (c) If used by a competitor it would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of 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.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavits, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the version(s) of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act

request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-0681.

Sincerely,

*/RA/*

Denise L. McGovern, Senior Project Manager  
Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors

Docket No(s): 52-027  
52-028

cc: See next page

J. A. Gresham

- 3 -

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Denise L. McGovern, Senior Project Manager  
Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors

Docket No(s): 52-027  
52-028

cc: See next page

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DATE	10/30/13	10/30/13	10/30/13	10/30/13

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(Revised 07/25/2013)

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