



*Southern California Edison Company*

23 PARKER STREET  
IRVINE, CALIFORNIA 92718

December 18, 1990

F. R. NANDY  
MANAGER, NUCLEAR LICENSING

TELEPHONE  
(714) 454-4504

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: **Docket No. 50-206**  
**Additional Information**  
**Thermal Shield Replacement Support System**  
**San Onofre Nuclear Generating Station Unit 1**

The purpose of this letter is to provide the NRC with the following information:

1. The proprietary and non-proprietary versions of Westinghouse drawing 1880E47, Revision 5, Thermal Shield Replacement Support Blocks (Enclosure 1).
2. Correction to the follow up information regarding the thermal shield sample bolts shipped to the NRC for corrosion testing (Enclosure 2).

The Westinghouse drawings were previously submitted to the NRC by our October 19, 1990 letter. However, in a telephone discussion on December 6, 1990, Mr. J. E. Tatum (NRC Project Manager) informed us that the proprietary drawing was missing from the letter transmitted to the NRC Document Control Desk and requested that we transmit the missing proprietary drawing. Mr. Tatum also requested that we retransmit the non-proprietary version of the drawing deleting extraneous editorial statements inside the proprietary brackets. Both drawings are included in Enclosure 1.

The thermal shield sample bolts were shipped to the NRC on November 16, 1990. These bolts are Stainless Steel 316 Strain Hardened, similar to those installed in the thermal shield replacement support blocks. Prior to shipment, the sample bolts were installed in Stainless Steel 304 blocks, torqued to specification, and locked in place using the crimping device. The enclosure to our November 29, 1990 letter incorrectly stated that the sample bolt material was Stainless Steel 304. Enclosure 2 to this letter provides the correct information regarding the sample bolts including bolt dimensions, bolt material type, and torque applied to each bolt.

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December 18, 1990

Enclosure 1 contains information proprietary to Westinghouse Electric Corporation, which 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 2.790 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 2.790 of the Commission's regulations.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the supporting Westinghouse Affidavit should reference CAW-90-077 and should be addressed to R. A. Wiesemann, Manager of Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

If you have any questions or comments, or if you would like additional information, please let me know.

Sincerely,



cc: J. B. Martin, Regional Administrator, NRC Region V  
C. W. Caldwell, NRC Senior Resident Inspector, SONGS 1, 2 and 3  
C. D. Townsend, NRC Resident Inspector, San Onofre Unit 1

ENCLOSURE 1  
DRAWING 1880E47, Rev. 5

Proprietary Information Notice

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.790 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 on the brackets remain, the information that was 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 (g) contained within parentheses 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)(g) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.790(b)(1).

## Copyright Notice

The information transmitted herewith bears a Westinghouse copyright notice. The NRC is permitted to make the number of copies of this information which are 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 2.790 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of this information, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. The NRC is not authorized to make copies for the personal use of members of the public who make use of the NRC public document rooms. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.



Westinghouse  
Electric Corporation

Energy Systems

Nuclear and Advanced  
Technology Division

Box 355  
Pittsburgh Pennsylvania 15230-0355

October 12, 1990  
CAW-90-077

Document Control Desk  
US Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Dr. Thomas Murley, Director

APPLICATION FOR WITHHOLDING PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Southern California Edison Thermal Shield Support System Replacement,  
Westinghouse Drawing 1880E47, Rev. 5

Dear Dr. Murley:

The proprietary information for which withholding is being requested in the above-referenced letter is further identified in Affidavit CAW-90-077 signed by the owner of the proprietary information, Westinghouse Electric Corporation. 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 2.790 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Southern California Edison.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-90-077, and should be addressed to the undersigned.

Very truly yours,

  
Robert A. Wiesemann, Manager  
Regulatory & Legislative Affairs

Enclosures

cc: C. M. Holzle, Esq.  
Office of the General Counsel, NRC

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AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

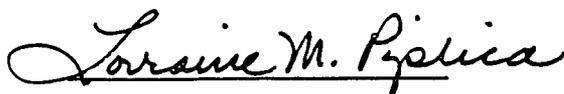
COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Robert A. Wiesemann, 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 Corporation ("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:

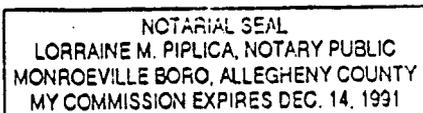


Robert A. Wiesemann, Manager  
Regulatory and Legislative Affairs

Sworn to and subscribed  
before me this 12<sup>th</sup> day  
of October, 1990.



Notary Public



- (1) I am Manager, Regulatory and Legislative Affairs, in the Nuclear and Advanced Technology Division, of the Westinghouse Electric Corporation 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 rulemaking proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Energy Systems Business Unit.
- (2) I am making this Affidavit in conformance with the provisions of 10CFR Section 2.790 of the Commission's regulations and in conjunction with the Westinghouse application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by the Westinghouse Energy Systems Business Unit 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 2.790 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.
- (g) It is not the property of Westinghouse, but must be treated as proprietary by Westinghouse according to agreements with the owner.

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 which 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 10CFR Section 2.790, 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 "Westinghouse Drawing 1880 E 47 Rev. 5", for San Onofre Nuclear Generating Station, Unit 1, being transmitted by the Southern California Edison Company (SCE) letter and Application for Withholding Proprietary Information from Public Disclosure, F. R. Nandy, Manager of Nuclear Licensing, SCE, to NRC Document Control Desk, Attention J. Tatum, October, 1990. The proprietary information as submitted for use by Southern California Edison Company for San Onofre Unit 1 in response to certain NRC requirements for justification of reactor vessel internals integrity.

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

- (a) Provide documentation of design and manufacturing details of the thermal shield support system.
- (b) Demonstrate the structural integrity of the core barrel, thermal shield and thermal shield support blocks.
- (c) Demonstrate no adverse impact on plant operation due to degradation of thermal shield supports.
- (d) Assist the customer to obtain NRC approval.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purposes of meeting NRC requirements for licensing documentation.
- (b) Westinghouse can sell support and defense of the technology to its customers in the licensing process.

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 analytical documentation 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 for system design, analytical techniques and performing tests and evaluations.

Further the deponent sayeth not.



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