



**Luminant**

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REF: 10CFR50.90

CP-201301332  
TXX-13169

November 26, 2013

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

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT (CPNPP)  
DOCKET NOS. 50-445 AND 50-446  
LICENSE AMENDMENT REQUEST (LAR) 13-01 SUPPLEMENT  
SPENT FUEL POOL CRITICALITY ANALYSIS REMOVAL TECHNICAL  
SPECIFICATIONS 3.7.16, "FUEL STORAGE POOL BORON CONCENTRATION,"  
3.7.17, "SPENT FUEL ASSEMBLY STORAGE," 4.3, "FUEL STORAGE," AND 5.5  
"PROGRAMS AND MANUALS"  
(TAC NOS. MF1365 AND MF1366)

REFERENCE: 1. Letter logged TXX-13045, dated March 28, 2013, License Amendment Request (LAR) 13-01, Revision to Technical Specifications 3.7.16, "FUEL STORAGE POOL BORON CONCENTRATION," 3.7.17, "SPENT FUEL ASSEMBLY STORAGE," 4.3, "FUEL STORAGE," and 5.5 "PROGRAMS AND MANUALS" (ML 13095A023)

2. Letter logged TXX-13109, dated July 16, 2013, "Supplemental Information supporting LAR 13-01, Spent Fuel Pool Criticality Analysis" (ML 13205A056)

3. Letter dated November 5, 2013, from Balwant Singal of the NRC to Rafael Flores of Luminant Power, RE: Request for Additional Information

Dear Sir or Madam:

In March 2013, Luminant Generation Company LLC (Luminant Power) submitted a License Amendment Request (LAR) 13-01 (Reference 1 as supplemented by Reference 2) to the NRC for Facility Operating License Nos. NPF-87 and NPF-89 for Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2, respectively. This LAR proposes a change to the CPNPP, Units 1 and 2, Technical Specifications based on an updated criticality analysis methodology for the spent fuel pools.

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A001  
HRR

Per Reference 3, the U.S. Nuclear Regulatory Commission (NRC) staff has requested additional information (RAI), regarding the LAR, be submitted in order to complete its review. Attachment 1 to this letter is the proprietary version of Luminant Power's response to the RAIs. Attachment 2 provides a non-proprietary version of Luminant Power's response to the RAIs.

Also enclosed is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-13-3859, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice.

As Attachment 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 10CFR 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-13-3859 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

In accordance with 10CFR50.91(b), Luminant Power is providing the State of Texas with a copy of this proposed amendment.

Attachment 1 of Reference 1, Description and Assessment, which addresses the no significance hazards consideration standards set forth in 10CFR50.92, remains valid and does not require change.

This communication contains the following new commitments regarding Comanche Peak Units 1 and 2.

<u>Commitment No.</u>	<u>Description</u>
4753383	The BORAL Monitoring Program ensures that: (a) future coupons removed for testing are reinserted into the SFP after testing is complete, (b) location and move times are tracked for the samples (to enable demonstration of the total duration that test coupons were removed from the pool environment), and (c) includes a requirement to perform continual testing every 10 years as long as the Region I storage racks are licensed to store fuel.
4753402	BORAL is credited in the Region I racks for both the borated and non-borated cases. The BACKGROUND section of the TS Bases B 3.7.16, 4th paragraph, 1st sentence will be changed to state: "In order to maintain $k_{eff}$ less than or equal to 0.95, the presence of fuel pool soluble boron is credited for the storage of fuel assemblies within the Region I and Region II racks (in addition to the BORAL neutron absorber material in Region I)."

4753403

The supporting Criticality Safety Analysis demonstrated  $K_{eff}$  remains LESS THAN 1.0 for all analyzed conditions (reference WCAP-17728-P Rev 1 section 2.1.1). The BACKGROUND section of the TS Bases B 3.7.16, 3rd paragraph, last sentence will be changed to state:

"The neutron absorber material BORAL is credited for the storage of spent fuel assemblies within the Region I racks to maintain  $K_{eff}$  less than 1.0 at 0 ppm soluble boron concentration."

Should you have any questions, please contact Mr. J. D. Seawright at (254) 897-0140.

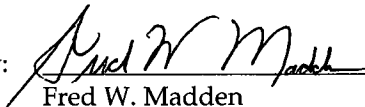
I state under penalty of perjury that the foregoing is true and correct.

Executed on November 26, 2013.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By:   
Fred W. Madden  
Director, External Affairs

- Attachments: 1. Comanche Peak Responses to LAR 13-01 Request for Additional Information (RAI) (Proprietary)
2. Comanche Peak Responses to LAR 13-01 Request for Additional Information (RAI) (Non-Proprietary)

Enclosure: Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-13-3859, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice

c - Marc L. Dapas, Region IV (w/o Attachment 1)  
Balwant K. Singal, NRR  
Sebrosky, Joseph, NRR  
Resident Inspectors, Comanche Peak (w/o Attachment 1)

Mr. Robert Free (w/o Attachment 1)  
Environmental Monitoring & Emergency Response Manager  
Texas Department of State Health Services  
Mail Code 1986  
P. O. Box 149347  
Austin, Texas 78714-9347

Comanche Peak Responses to LAR 13-01  
Request for Additional Information (RAI)

1. In Enclosure 1 to TXX-13045, Section 4, it states that "CPNPP will establish a Boral coupon surveillance program." The NRC staff would like clarification of this statement including:
  - a. Please discuss when the program will be established and implemented.
  - b. Please discuss whether there are any other previous surveillance results and, if so, provide a summary of them.

**Luminant Response to RAIs 1.a and 1.b:**

CPNPP has obtained recommendations for the BORAL coupon surveillance program from the Region I Storage Rack vendor, and is including these recommendations into CPNPP procedures. These procedure changes ensure future coupon tests occur on schedule, and contain acceptance criteria, and actions to take if the criteria are not satisfied. These procedure changes are currently scheduled to be ready for implementation by December 8, 2013.

The testing has been completed for the first coupons (one test coupon from each SFP), and showed no measureable degradation of the neutron absorbing material. The lowest measured B-10 content of the two measured samples was  $0.0337 \text{ g / cm}^2$ . All thickness measurements were  $0.100 \pm 0.002$ , with one exception of a small bulge on one of the coupons, which was approximately 0.3" in diameter, with a height of 0.006" greater than the nominal thickness of the panel.

Based on the first coupon results, the criteria from the proposed TS program section 5.5.22 were satisfied, therefore no further evaluation of the absorber materials is needed at this time.

Comanche Peak Responses to LAR 13-01  
Request for Additional Information (RAI)

2. As part of the criticality analysis, WCAP-17728-P, blisters were evaluated. The WCAP states that at a [[ ]] the racks would maintain their functionality. The NRC staff has also reviewed the Boral coupon surveillance program and the monitoring program for the blisters is not apparent. Please discuss whether the program will monitor blisters and trend any blister formation or increase in blister size. Also, if they are being monitored, please discuss the acceptance criteria for the height of the blisters.

**Luminant Response to RAI 2:**

The criteria specified in the surveillance program include a requirement to perform further evaluation if “an increase in thickness at any point is greater than 25% of the initial thickness at that point.” These evaluation criteria were established based on vendor recommendations for identifying BORAL degradation. The maximum blister height assumption utilized in the Criticality Safety Analysis was established conservative to this value.

Since the nominal thickness of the coupons is approximately 0.101”, the criteria specified in proposed TS program 5.5.22 ensures the maximum thickness is approximately 0.126” (the exact value depends on the initial thickness). Therefore, a blister which is approximately 0.025” high would fail the criteria, and require further evaluation of the absorber materials. This criteria was established based on recommendations from the BORAL vendor, and is established based on an unexpected value which warrants investigation. The blister height utilized in the Criticality Safety Analysis was established conservatively high relative to this criteria in the Monitoring Program.

As described further in the response to Question #4, CPNPP will ensure that future samples are returned and reinserted in the Spent Fuel Pools after testing is complete. The procedure will ensure that if blisters (or other visible signs of degradation) are observed on these samples, the degradation area will be observed and photographed each time the coupon tree is lifted from the storage racks (for coupon removal or replacement) and compared to previous observations to monitor for adverse trends. If further degradation is visually identified which could potentially challenge the evaluation criteria, the coupon will be removed for additional testing, and the normal BORAL Monitoring Program acceptance criteria will apply to these non-scheduled tests.

Comanche Peak Responses to LAR 13-01  
Request for Additional Information (RAI)

3. In proposed TS 5.5.22 (in Attachment 2 to TXX-13045 on page 18/18 and Attachment 4 to TXX-13045 on page 17/18), the thickness criteria for the Boral coupons is: "An increase in thickness at any point is greater than 25% of the initial thickness at that point." The NRC staff would like clarification of this statement including:

- a. Please discuss whether the initial coupon thicknesses are at least 25 percent less than the thickness listed in the criticality analysis.

**Luminant Response to RAI 3.a:**

The thickness of the testing coupons is consistent with the BORAL material utilized in the Region I racks, and consistent with the assumed nominal thickness utilized in the Criticality Safety Analysis (0.101 inches).

The maximum acceptable coupon thickness, based on the monitoring program acceptance criteria, would be approximately 0.126 inches (25% above the initial coupon thickness). This value is bounded by the maximum acceptable thickness demonstrated in the Criticality Safety Analysis [

]<sup>a,c</sup>

- b. Please define what is meant by thickness. Does this include the thickness/height of the blister?

**Luminant Response to RAI 3.b:**

The criteria for thickness is established to monitor the BORAL thickness "at any point", which includes potential growth due to blisters or swelling. Note that the first test results demonstrate that a single point of local swelling was observed, which satisfied the 25% criteria because the thickness at that point was 0.006" greater than the nominal thickness at that point. If this area were more than 0.025" greater than the nominal thickness at that point, this criterion would not be satisfied, and CPNPP would need to perform further evaluation of the absorber materials, including an investigation into the degradation and potential impacts on the Criticality Safety Analysis.

Comanche Peak Responses to LAR 13-01  
Request for Additional Information (RAI)

- c. Please justify why the 25 percent increase in thickness is acceptable.

**Luminant Response to RAI 3.c:**

The 25% criterion was established based on recommendations from the BORAL vendor for monitoring for potential degradation. An increase in thickness of 25% does not impact the design function of the BORAL neutron absorbers, which is supported by the Criticality Safety Analysis. The Criticality Safety Analysis was performed utilizing assumptions much more conservative than the evaluation criteria established by the BORAL Monitoring Program evaluation criteria, both for thickness and for B-10 content.

4. In Enclosure 1 to TXX-13045, Section 4, there is discussion about having enough coupons to cover the current operating license and license renewal. The spent fuel pool, however, will be inservice beyond the operating license and be used when the reactor is defueled. In this case, the spent fuel pool, and thereby the Boral, will still be inservice past the operating and license renewal period. Please discuss whether there will be enough coupons to monitor the Boral until the end of the spent fuel pool life (when the spent fuel pool is permanently defueled).

**Luminant Response to RAI 4:**

CPNPP recognizes the need to address the lifetime of the Region I storage cells beyond the operating and license renewal period. The BORAL monitoring program recommendations provided by the BORAL vendor allow for re-insertion of the coupons into the Spent Fuel Pools after testing, since the testing performed is non-destructive. The duration the coupons are removed for testing, which may be 2-3 months, is very small in comparison to the lifetime of the Spent Fuel Pool, and therefore the time the coupons spend removed from the pool environment does not have a significant impact on the ability for the coupons to detect signs of degradation. The program to be implemented at CPNPP ensures that:

- (a) future coupons removed for testing are reinserted into the SFP after testing is complete,
- (b) location and move times are tracked for the samples (to enable demonstration of the total duration that test coupons were removed from the pool environment), and
- (c) includes a requirement to perform continual testing every 10 years as long as the Region I storage racks are licensed to store fuel.

Comanche Peak Responses to LAR 13-01  
Request for Additional Information (RAI)

5. Please discuss whether the racks and coupons are vented. If so, discuss whether the coupon vents are representative of the rack vents.

**Luminant Response to RAI 5:**

The rack cells and BORAL coupon test trees are open to the SFP environment. The coupon sheathing which secures the BORAL material to the Region I storage cells provides a vented enclosure, as is described in the original LAR which implemented the current storage rack design (reference ML012560143, Enclosure 1 to TXX-00144, section 2.6.2.d).

6. In Attachment 3 to TXX-13045 on page 9/18, the proposed TS bases, B 3.7.16, Background, states "The neutron absorber material Boral is credited for the storage of spent fuel assemblies within Region 1 racks to maintain Keff less than or equal to 1.0 at 0 ppm [parts per million] soluble boron concentration." The NRC staff needs clarification on this statement including:
  - a. Please discuss whether or not the Boral material is credited in the borated case. This information is not mentioned in the background.

**Luminant Response to RAI 6.a:**

BORAL is credited in the Region I racks for both the borated and non-borated cases. This will be clarified in the TS Bases during the implementation.

The BACKGROUND section of B 3.7.16, 4<sup>th</sup> paragraph, 1<sup>st</sup> sentence will be changed to state: "In order to maintain keff less than or equal to 0.95, the presence of fuel pool soluble boron is credited for the storage of fuel assemblies within the Region I and Region II racks (in addition to the BORAL neutron absorber material in Region I)."



Comanche Peak Responses to LAR 13-01  
Request for Additional Information (RAI)

- b. Please clarify why it is necessary to “maintain  $K_{eff}$  less than or equal to 1.0” when the regulations state that  $K_{eff}$  in the non-borated case should be less than 1.0. There is no provision for  $K_{eff}$  to be equal to 1.0.

**Luminant Response to RAI 6.b:**

WCAP-17728-P Rev 1 submitted with the License Amendment Request provides the correct analytical requirement consistent with the regulations. This was an administrative error in the draft proposed Bases, and will be corrected during implementation. The supporting Criticality Safety Analysis demonstrated  $K_{eff}$  remains LESS THAN 1.0 for all analyzed conditions (reference WCAP-17728-P Rev 1 section 2.1.1).

The BACKGROUND section of B 3.7.16, 3<sup>rd</sup> paragraph, last sentence will be changed to state: “The neutron absorber material BORAL is credited for the storage of spent fuel assemblies within the Region I racks to maintain  $K_{eff}$  less than 1.0 at 0 ppm soluble boron concentration.”

7. Please confirm that in Attachment 6 to TXX-13045 on page 8/8 in Table 9.1-4 that the second and third column title should be U1 Discharged and U2 Discharged, respectively.

**Luminant Response to RAI 7:**

This is a typographical error in the Proposed Final Safety Analysis Report Changes, and will be corrected during the implementation. The referenced titles should be “U1 Discharged” and “U2 Discharged.”

8. Please confirm that on [[  
]].

**Luminant Response to RAI 8:**

[

] <sup>a,c</sup>

9. Please confirm that [[ ]] is the nominal areal density and that [[ ]] is the minimum certified areal density.

**Luminant Response to RAI 9:**

The nominal areal density and the minimum certified areal density as stated in the question are correct.

Enclosure to TXX-13169



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Engineering, Equipment and Major Projects  
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USA

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

Direct tel: (412) 374-4643  
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e-mail: greshaja@westinghouse.com  
Proj letter: NF-TB-13-114

CAW-13-3859

November 22, 2013

APPLICATION FOR WITHHOLDING PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE

Subject: CE-13-778, Attachment 1, "Proprietary Information Identification in the Comanche Peak Responses to LAR-13-01 Request for Additional Information (RAI) Set #1 Markups" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-13-3859 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 Luminant Generation Company LLC.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse Affidavit should reference CAW-13-3859, and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 310, 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 horizontal line.

James A. Gresham, Manager  
Regulatory Compliance

Enclosures

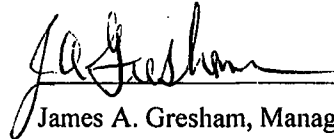
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COMMONWEALTH OF PENNSYLVANIA:

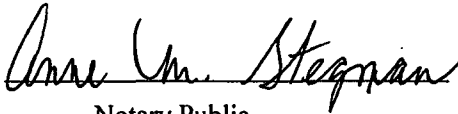
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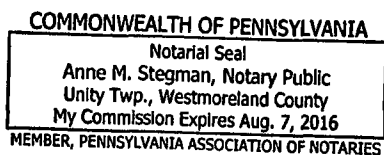
COUNTY OF BUTLER:

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 22nd day of November 2013

  
Notary Public



- (1) I am Manager, Regulatory Compliance, in Engineering, Equipment and Major Projects, 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.
- (iii) 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.
- (iv) 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.
- (v) 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.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in CE-13-778, Attachment 1, "Proprietary Information Identification in the Comanche Peak Responses to LAR-13-01 Request for Additional Information (RAI) Set #1 Markups" (Proprietary), for submittal to the Commission, being transmitted by Luminant Generation Company LLC 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 Westinghouse's request for NRC approval of WCAP-17728, Revision 1, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
  - (i) Obtain NRC approval of WCAP-17728-P, Revision 1, "Comanche Peak Nuclear Power Plant Units 1 and 2 Spent Fuel Pool Criticality Safety Analysis."
  - (ii) Demonstrate the sub-criticality of the Comanche Peak spent fuel pools.
- (b) Further this information has substantial commercial value as follows:
  - (i) Westinghouse plans to sell the use of the information to its customers for the purpose of demonstrating the sub-criticality of the spent fuel pool.
  - (ii) Westinghouse can sell support and defense of spent fuel pool criticality analysis.
  - (iii) 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 generic and/or 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).

## **COPYRIGHT NOTICE**

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports 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 2.390 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 these reports, 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. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.