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Columbia Fuel Site
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USA

Director, Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
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Your ref:
Our ref: LTR-RAC-14-40

~~Security-Related & Proprietary Information Notices~~

~~Enclosure 1 to this letter contains security-related information which is to be withheld from public disclosure in accordance with RIS 2005-31. Enclosure 5 to this letter contains proprietary information which is to be withheld from disclosure under 10CFR 2.390. The balance of this letter may be considered public upon removal of Enclosures 1 and 5.~~

July 31, 2014

SUBJECT: SNM-1107 LICENSE RENEWAL

Westinghouse Electric Company LLC (Westinghouse) hereby requests renewal of our Columbia Fuel Fabrication Facility (CFFF) license SNM-1107 for a term of forty years. This renewal application (Enclosure 1, Security Related SUNSI) is submitted in accordance with applicable regulations 10CFR70.33, 10CFR70.21 and 10CFR70.22. This application also contains clear and specific references to information contained in previous applications, statements or reports filed with the Commission (Enclosure 2).

The reason for this renewal is primarily to request a licensing term of forty years as per NRC Staff Requirements Memorandum SECY-06-0186, "Increasing Licensing Terms for Certain Fuel Cycle Facilities," in which NRC approved recommendations to implement a maximum license term of 40 years for license renewals and new applications. Unfortunately, this document was not issued in time for Westinghouse to use during their last renewal efforts. In the SECY paper, it was noted: "...the two licensees who requested only a 20-year renewal term will be allowed to request up to a 40-year renewal term. However, those licensees would have to submit a revised Environmental Report covering the requested term, and the NRC would perform at least an Environmental Assessment covering the requested term."

Westinghouse believes a forty year license is appropriate for the CFFF and that potential environmental effects as well as material degradation and aging issues are adequately addressed by the existing safety basis requirements and licensed programs. Further justification for this renewal is provided in Enclosure 3, and our updated Environmental Report for the Columbia Fuel Fabrication Facility is provided in Enclosure 4.

The most significant changes from the currently approved SNM-1107 License application are in the Management Measures section of the License Application, and specifically in Quality Assurance (Section 3.3). Westinghouse is also requesting a modification to the Calcium Fluoride Release Limit in Section 12.1.6

(Enclosure 5, Proprietary) and the authorized material possession limit of U-235 enriched to no greater than 5 weight-percent.

Enclosure 5 is proprietary in its entirety, and a non-proprietary version is not submitted. In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Commission's regulations, an Application for Withholding Proprietary Information from Public Disclosure, with Proprietary Information Notice and Copyright Notice (Non-Proprietary), and an Affidavit (Non-Proprietary) are included. The Affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission.

The CFFF has operated safely and securely while protecting public health and the environment since September 1969. Our defense-in-depth design philosophy assures that potential impacts of CFFF operations to the public, the workers and the environment remain well below regulatory limits. Projecting results of future operations, utilizing existing engineering standards and best practices, will assure that any potential cumulative impacts of operating the plant for the next 40 year period will continue to be minimal. Also, any revisions to processes or production which could change that conclusion would require NRC pre-approval and submittal of ISA documentation to assure continued safe operation of the plant.

I hereby affirm that the statements made in this application are complete, true and correct to the best of my knowledge and belief. If you have any questions, please call me at (803) 647-3338.

Sincerely,



Nancy Blair Parr
Manager, Licensing

Enclosures:

1. Enclosure 1, Application for Renewal of SNM-1107 (Security-Related SUNSI)
2. Enclosure 2, References
3. Enclosure 3, Justification for a 40-Year License Extension for the CFFF
4. Enclosure 4, Environmental Report for the CFFF
5. Enclosure 5, Calculation Note: CN-SB-12-018, Revision 0 (Proprietary)

Enclosure 1 transmitted herewith contain(s) Security-Related - Sensitive Unclassified Non-Safeguards Information (SUNSI) subject to Withholding under 10 CFR 2.390.

Enclosure 5 transmitted herewith contain(s) Westinghouse Proprietary Information subject to Withholding under 10 CFR 2.390.

cc: w/o enclosures

U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, Maryland 20852-2738
Attn: Mr. Christopher Ryder
Mail Stop: EBB 2C40M

U. S. Nuclear Regulatory Commission, Region II
245 Peachtree Center Avenue NE, Suite 1200
Atlanta, GA 30303-1257
Attn: Mr. Manuel Crespo

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: "Calculation Note: CN-SB-12-018, Revision 0" (Proprietary)

Reference: Letter from Nancy Blair Parr to Director, Office of Nuclear Material Safety and Safeguards,
LTR-RAC-14-40 dated July 31, 2014

The Application for Withholding Proprietary Information from Public Disclosure is submitted by Westinghouse Electric Company LLC (Westinghouse), pursuant to the provisions of paragraph (b)(1) of Section 2.390 of the Commission's regulations. It contains commercial detailed calculations proprietary to Westinghouse and customarily held in confidence.

The information for which withholding is being requested is identified in the proprietary version of the subject report. In conformance with 10 CFR Section 2.390, an Affidavit accompanies this Application for Withholding Proprietary Information from Public Disclosure, setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Should you have any questions or require any additional information, please telephone me directly at (803) 647-3338.

Sincerely,



Nancy Blair Parr
Manager, Licensing

AFFIDAVIT

- (1) I am the Plant Manager, Columbia Fuel Fabrication Facility (CFFF) within Nuclear Fuel, 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 Westinghouse CFFF submittals to the NRC, 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 competitors 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 the enclosed report, "Calculation Note: CN-SB-12-018, Revision 0" (Proprietary), for submittal to the Commission, being transmitted by Westinghouse letter, LTR-RAC-14-40 and Application for Withholding Proprietary Information from Public Disclosure. The proprietary information as submitted is that associated with a

Westinghouse Columbia Fuel Fabrication Facility licensed process and contains “plant specific” data and calculations.

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 without commensurate expenses.

In order for competitors of Westinghouse to duplicate this information, similar technical calculations would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

The averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief:

A handwritten signature in black ink, appearing to read "David J. Precht". The signature is written in a cursive, flowing style.

David J. Precht, Plant Manager
Columbia Fuel Fabrication Facility
Westinghouse Electric Company LLC

PROPRIETARY INFORMATION NOTICE

Transmitted herewith is a proprietary version of a document furnished to the NRC in connection with a submittal of Westinghouse Columbia Fuel Fabrication Facility information, specifically a plant specific calculation in support of its License Renewal effort, and may be used only for that purpose. A non-proprietary version of the enclosure is essentially blank pages and therefore is not provided.

COPYRIGHT NOTICE

If any documents transmitted herewith bear a Westinghouse copyright notice, the NRC is permitted to make the number of copies of the information contained in this report which are necessary for its internal use in connection with review of the report, "Calculation Note: CN-SB-12-018, Revision 0" 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.