



Exelon Generation®

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10 CFR 50.90

February 2, 2015

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

Calvert Cliffs Nuclear Power Plant, Units Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Subject: Supplemental Information – Atmospheric Dump Valves License Amendment Request

- References:
1. Letter from G. H. Gellrich (Exelon Generation) to Document Control Desk (NRC), dated November 3, 2014, Response to Request for Additional Information Regarding Atmospheric Dump Valves License Amendment Request
 2. Letter from George H. Gellrich (Exelon Generation) to Document Control Desk (NRC), dated January 13, 2014, License Amendment Request: Add Technical Specification for Atmospheric Dump Valves

Reference 1 submitted a response to a request for information. A proprietary calculation and affidavit were submitted with Reference 1. It was determined that the affidavit referred to a different revision of the proprietary calculation than was submitted. The attached affidavit refers to the correct revision of the submitted calculation and should be used to withhold the proprietary calculation included in Reference 1 from public disclosure.

We apologize for any inconvenience this may have caused.

The supplemental information provided does not change the no significant hazards determination provided in Reference 2 and the categorical exclusion set forth in 10 CFR 51.22(c)(9) is still valid. There are no regulatory commitments contained in this correspondence.

Should you have questions regarding this matter, please contact Mr. Douglas E. Lauer at (410) 495-5219.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on
February 2, 2015.

Respectfully,



George H. Gellrich
Site Vice President

GHG/PSF/bjm

Attachment: (1) Westinghouse Affidavit

cc: NRC ISFSI Project Manager

~~(Without Enclosure 2)~~

NRC Project Manager, Calvert Cliffs
NRC Regional Administrator, Region I
NRC Resident Inspector, Calvert Cliffs
S. Gray, MD-DNR

ATTACHMENT (1)

WESTINGHOUSE AFFIDAVIT

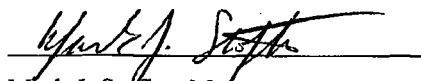
AFFIDAVIT

STATE OF CONNECTICUT:

ss

COUNTY OF HARTFORD:

I, Mark J. Stofko, am 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 my knowledge, information, and belief.


Mark J. Stofko, Manager
I&C Licensing

- (1) I am Manager, I&C Licensing, 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 constitute Westinghouse policy and provide 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 contained in CN-TAS-05-13, Revision 0, "Calvert Cliffs Units 1 & 2 Steam Generator Tube Rupture Event" (Proprietary), for submittal to the Commission, being transmitted by Exelon Generation Company 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 Steam Generator Tube Rupture Safety Analysis and associated Radiological Dose methodologies, and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to:
 - (i) Perform Non-LOCA UFSAR Safety Analyses.

- (ii) Perform Alternative Source Term Radiological Dose Analyses.
- (b) Further this information has substantial commercial value as follows:
- (i) Westinghouse plans to sell the use of similar information to its customers for the purpose of modeling operator actions as part of a Non-LOCA safety analysis event.
 - (ii) Westinghouse can sell support and defense of Alternative Source Term analyses and methodologies.
 - (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.