



~~The Attachments to the Enclosure contain
PROPRIETARY information to be withheld
under 10 CFR 2.390~~

10 CFR 50.55a

John J. Cadogan
Vice President Nuclear Engineering

**Palo Verde
Nuclear Generating Station**
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102-07037-JJC/JR
April 17, 2015

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

Reference Arizona Public Service Company (APS) letter number 102-07034, Palo Verde Nuclear Generating Station Unit 3, Docket No STN 50-530, *American Society of Mechanical Engineers (ASME) Code, Section XI, Request for Approval of an Alternative to Flaw Removal - Relief Request 53, dated April 17, 2015*

Dear Sirs

**Subject Palo Verde Nuclear Generating Station (PVNGS) Unit 3
Docket No 50-530
Transmittal of Proprietary Documents for Relief Request 53**

On April 17, 2015, pursuant to 10 CFR 50.55a(z)(1), Arizona Public Service Company (APS) submitted the referenced letter for Nuclear Regulatory Commission (NRC) approval of Relief Request 53

This letter transmits proprietary documents referenced in APS letter number 102-07034. The attachments to the enclosure of this letter contain the proprietary documents. Affidavits provided by Westinghouse Electric Company (Westinghouse), the owner of the information, to support the proprietary nature of the information are included in the enclosure. The affidavits, signed by Westinghouse, set 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 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the proprietary documents or the supporting Westinghouse affidavits should be addressed to James Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3, Cranberry Township, Pennsylvania, 16066

Should you need further information regarding this submittal, please contact Thomas N. Weber, Nuclear Regulatory Affairs Department Leader, at (623) 393-5764

~~When the Attachments to the Enclosure are separated,
this document is not considered Proprietary~~

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NRR

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102-07037-JJC/JR
ATTN Document Control Desk
U S Nuclear Regulatory Commission
Transmittal of Proprietary Documents for Relief Request 53
Page 2

No commitments are being made to the NRC by this letter

Sincerely,

A handwritten signature in black ink, appearing to read 'JJC/JR', with a stylized, cursive script.

JJC/JR

Enclosure - Proprietary Documents Related to Relief Request 53

cc	M L Dapas	NRC Region IV Regional Administrator
	M M Watford	NRC NRR Project Manager
	C A Peabody	NRC Senior Resident Inspector for PVNGS

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Enclosure

Proprietary Documents Related to Relief Request 53

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PROPRIETARY information to be withheld
under 10 CFR 2 390~~

Enclosure
Proprietary Documents Related to Relief Request 53

The attachments to the enclosure provide the proprietary documents referred to in Arizona Public Service Company (APS) letter number 102-07034, *Palo Verde Nuclear Generating Station Unit 3, Docket No STN 50-530, American Society of Mechanical Engineers (ASME) Code, Section XI, Request for Approval of an Alternative to Flaw Removal - Relief Request 53*, dated April 17, 2015. Affidavits to support the proprietary nature of these documents are included in this enclosure.

These documents are supported by affidavits signed by Westinghouse, the owner of the information. The affidavits set forth the basis on which the information may be withheld from public disclosure by the Commission and address 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 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the proprietary documents or the supporting Westinghouse affidavits should be addressed to James Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3, Cranberry Township, Pennsylvania, 16066.

This enclosure consists of two pages of descriptive information and two affidavits to support withholding the proprietary information in the attachments in accordance with 10 CFR 2.390. The affidavits are not considered proprietary and are as follows:

- Affidavit for Document DAR-MRCDA-15-6-P, Rev 1
- Affidavit for Documents Supporting DAR-MRCDA-15-6-P, Rev 1

The proprietary attachments are as follows:

Attachment 1 – Westinghouse Document DAR-MRCDA-15-6-P, Rev 1, *Palo Verde Unit 3 RCS Cold Leg Alloy 600 Small Bore Nozzle Repair*

Attachment 2 – Westinghouse Calculation CN-MRCDA-15-13, Rev 0, *Qualification of Palo Verde Unit 3 Reactor Coolant Pump Replacement Instrumentation Nozzle*

Attachment 3 – Westinghouse Calculation CN-PAFM-15-20, Rev 2, *Palo Verde Unit 3 RCS Cold Leg Alloy 600 Small Bore Nozzle Repair Transient Stress and Fracture Mechanics Evaluation for One Cycle Operation*

Attachment 4 – Westinghouse Calculation TR-FSE-15-2, Rev 1, *Palo Verde Nuclear Generating Station Unit 3 Evaluation of Potential Loose Part – Reactor Coolant Pump Instrument Nozzle Weld Fragment*

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under 10 CFR 2.390~~

Enclosure
Proprietary Documents Related to Relief Request 53

- Attachment 5 – Westinghouse Letter, LTR-ME-15-30, Rev 2, *ASME Code Section XI Reconciliation for Arizona Public Service (APS), Palo Verde Nuclear Generating Station (PVNGS) Unit 3 Replacement Instrument Nozzle*
- Attachment 6 – Westinghouse Calculation CN-NPE-06-03, Rev 1, *Plant X - Structural Evaluations of the RCP Pressure Tap Nozzles*
- Attachment 7 – Drawings Referenced in Responses to NRC Questions
- C-8000-101-2017, Rev 2, *Wall Static Pressure Suction*
 - STD-009-0009, Rev 2, *Coolant Pumps Weld Joint Identification and Fabrication Requirements*
 - DWG 339-0054, Rev 0, *Safe End Mach Of Pressure Tap Holes and Weld Prep (Suction)*
 - C-14473-220-002, Rev 0, *Replacement Pressure Tap Nozzle*
 - E-14473-220-001, Rev 0, *Pump Casing – A Pressure Tap Nozzle Modification Assembly*
 - SE-14473-220-003, Rev 0, *Pressure Tap nozzle Replacement Palo Verde Unit 3*

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Enclosure
Proprietary Documents Related to Relief Request 53

**Affidavit
for
Document
DAR-MRCDA-15-6-P, Rev 1**

**(NOTE Non-proprietary version of document submitted with
APS Letter Number 102-07034, Dated April 17, 2015)**

~~When the Attachments to the Enclosure are separated,
this document is not considered Proprietary~~



Westinghouse Electric Company
Engineering Equipment and Major Projects
1000 Westinghouse Drive, Building 3
Cranberry Township, Pennsylvania 16066
USA

U S Nuclear Regulatory Commission
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11555 Rockville Pike
Rockville, MD 20852

Direct tel (412) 374 4643
Direct fax (724) 940 8560
e mail greshaja@westinghouse.com
Proj letter CVER 15 34 Rev 1

CAW-15 4163

April 17, 2015

**APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE**

Subject DAR-MRCDA-15-6 P, Revision 1, "Palo Verde Unit 3 RCS Cold Leg Alloy 600 Small Bore Nozzle Repair" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-15-4163 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 Arizona Public Service (APS).

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-15 4163, and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Very truly yours,

A handwritten signature in black ink, appearing to read 'James A. Gresham', written over a horizontal line.

James A. Gresham, Manager

Regulatory Compliance

CAW-15-4163

April 17, 2015

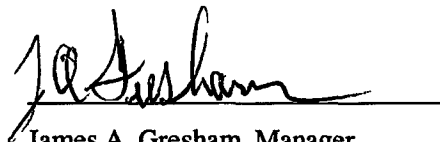
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA

ss

COUNTY OF BUTLER

I, James A Gresham, 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

A handwritten signature in black ink, appearing to read "JA Gresham", is written over a solid horizontal line.

James A Gresham, Manager

Regulatory Compliance

- (1) I am Manager, Regulatory Compliance, 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 appropriately marked in DAR-MRCDA-15-6-P, Revision 1, "Palo Verde Unit 3 RCS Cold Leg Alloy 600 Small Bore Nozzle Repair" (Proprietary), for submittal to the Commission, being transmitted by APS 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 the Palo Verde Unit 3 RCS Cold Leg Alloy 600 small bore nozzle repair, and may be used only for that purpose
- (a) This information is part of that which will enable Westinghouse to
 - (i) Provide fracture mechanics technical justification and structural evaluation to support continued operation for Palo Verde Unit 3 with reactor coolant pump instrument nozzle with a half-nozzle repair

- (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 providing fracture mechanics technical justification and structural evaluation to support operation of reactor coolant pumps with instrument nozzles with a half nozzle repair
 - (ii) Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications
 - (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 non-proprietary versions of documents furnished to the NRC that associated with the Palo Verde Unit 3 RCS Cold Leg Alloy 600 small bore nozzle repair, and may be used only for that purpose

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)(1)(a) through (4)(1)(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

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Enclosure
Proprietary Documents Related to Relief Request 53

Affidavit
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DAR-MRCDA-15-6-P, Rev 1

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Proj letter CVER-15 34 Rev 1

CAW-15-4164

April 17, 2015

**APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE**

Subject Supporting Documents to DAR-MRCDA-15-6

- 1 LTR-ME-15-30 Revision 2, "ASME Code Section XI Reconciliation for Arizona Public Service (APS), Palo Verde Nuclear Generating Station (PVNGS) Unit 3 Replacement Instrument Nozzle" (Proprietary)
- 2 CN-PAFM-15-20 Revision 2, "Palo Verde Unit 3 RCS Cold Leg Alloy 600 Small Bore Nozzle Repair Transient Stress and Fracture Mechanics Evaluation for One Cycle Operation" (Proprietary)
- 3 CN-MRCDA-15-13 Revision 0 "Qualification of Palo Verde Unit 3 Reactor Coolant Pump Replacement Instrumentation Nozzle" (Proprietary)
- 4 TR-FSE-15-2, Revision 1, "Palo Verde Nuclear Generating Station Unit 3 Evaluation of Potential Loose Part - Reactor Coolant Pump Instrument Nozzle Weld Fragment" (Proprietary)
- 5 CN-NPE-06-XXXX-03, Revision 1, "Plant X - Structural Evaluations of the RCP Pressure Tap Nozzles" (Proprietary)
- 6 C-14473-220 002, Revision 0, "Replacement Pressure Tap Nozzle" (Proprietary)
- 7 E-14473-220-001, Revision 0, "Pump Casing - A Pressure Tap Nozzle Modification Assembly" (Proprietary)
- 8 C-8000-101-2017, Revision 2, "Wall Static Pressure Suction" (Proprietary)
- 9 339-0054, Revision 0 "Safe End Mach Of Pressure Tap Holes & Weld Prep (Suction)" (Proprietary)
- 10 STD 009-0009, Revision 2, "Coolant Pumps Weld Joint Identification and Fabrication Requirements" (Proprietary)
- 11 SE-14473-220-003, Revision 0, "Pressure Tap Nozzle Replacement Palo Verde Unit 3" (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced reports is further identified in Affidavit CAW-15-4164 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.

The subject documents were prepared and classified as Westinghouse Proprietary Class 2. Westinghouse requests that the documents be considered proprietary in their entirety. As such, non-proprietary versions will not be issued.

CAW-15-4164

April 17, 2015

Accordingly this letter authorizes the utilization of the accompanying Affidavit by Arizona Public Service (APS)

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-15-4164, and should be addressed to James A Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township Pennsylvania 16066

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Gresham", written over a horizontal line.

James A Gresham Manager

Regulatory Compliance

CAW-15-4164

April 17, 2015

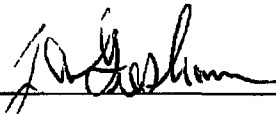
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COUNTY OF BUTLER

I, James A Gresham 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



James A Gresham Manager
Regulatory Compliance

- (1) I am Manager, Regulatory Compliance, 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
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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

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 - (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
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 - (f) It contains patentable ideas, for which patent protection may be desirable
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- (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 supports DAR MRCDA-15-6, for submittal to the Commission, being transmitted by APS 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 the Palo Verde Unit 3 RCS Cold Leg Alloy 600 small bore nozzle repair, and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to
 - (i) Provide fracture mechanics technical justification and structural evaluation to support continued operation for Palo Verde Unit 3 with reactor coolant pump instrument nozzle with a half-nozzle repair.

- (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 fracture mechanics technical justification and structural evaluation to support operation of reactor coolant pumps with instrument nozzles with a half nozzle repair
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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 the proprietary versions of documents furnished to the NRC associated with the Palo Verde Unit 3 RCS Cold Leg Alloy 600 small bore nozzle repair, and may be used only for that purpose. The documents are to be considered proprietary in their entirety.

COPYRIGHT NOTICE

The report transmitted herewith bears a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in this report which is 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. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.