


<b>NRC FORM 7</b> (11-2012) 10 CFR 110		 <b>U. S. NUCLEAR REGULATORY COMMISSION</b>		<b>APPROVED BY OMB: NO. 3150-0027</b>		<b>EXPIRES: (11/30/2015)</b>									
<b>APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S)</b> <i>(See Instructions on Pages 4 and 5)</i>								Estimated burden per response to comply with this mandatory collection request: 2.4 hours. This submittal is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the Information Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0027), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.							
<b>PART A. FOR NRC USE ONLY</b>				<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC		DATE RECEIVED									
LICENSE NUMBER <b>XCOM1111/03</b>				DOCKET NUMBER <b>11005030</b>		ADAMS ACCESSION NUMBER <b>ML15362A440</b>									
<b>PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS</b> (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)															
1. NAME AND ADDRESS OF APPLICANT/LICENSEE  Westinghouse Electric Company LLC 1000 Westinghouse Drive Cranberry Twp., PA 16066				1a. NAME OF APPLICANT'S CONTACT Erin P. McBride-Lovas		1b. APPLICANT'S REFERENCE NUMBER EML-15-044									
				1c. PHONE NUMBER (724) 940-8198		1d. FAX NUMBER (724) 940-8508									
				1e. E-MAIL ADDRESS mcbride@westinghouse.com											
2. TYPE OF ACTION REQUESTED (Check One)															
<input type="checkbox"/> EXPORT (Parts B, C, E)		<input type="checkbox"/> IMPORT (Parts B, D, E)		<input checked="" type="checkbox"/> AMENDMENT/RENEWAL Current License Number: <b>XCOM 1111 Am. 2</b>		<input type="checkbox"/> CONSENT REQUEST (Parts B, C) Current License Number:									
3. CONTRACT NUMBER(S)		4. FIRST SHIPMENT DATE		5. LAST SHIPMENT DATE		6. PROPOSED EXPIRATION DATE 7/23/2035									
<b>PART C. TO BE COMPLETED FOR EXPORT LICENSES, AMENDMENTS, OR RENEWALS</b> (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)															
7. NAME(S) / ADDRESS(ES) OF SUPPLIERS AND/OR OTHER PARTIES TO THE EXPORT				8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S) Various Entities in China		9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S)									
7a. FUNCTION(S) PERFORMED/SERVICE(S) PROVIDED				8a. INTERMEDIATE USE(S)		9a. ULTIMATE END USE(S)									
10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS; FOR NUCLEAR EQUIPMENT INCLUDE TOTAL DOLLAR VALUE OF EQUIPMENT FOR EXPORT  Equipment controlled by 10 CFR 110 appendix A(5) through (11) including the instrumentation and control (I&C), parts for Appendix A(5) through (11) items, including services/test/installation tools and equipment for appendix A(5) through (11) items.				10a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)		10b. MAX ENRICHMENT OR WGT %	10c. MAX ISOTOPE WGT (KG)								
11. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)															

NRC FORM 7  
(11-2012)  
10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

**APPLICATION FOR NRC EXPORT OR IMPORT  
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)**

LICENSE NUMBER <b>XCOM1111/03</b>	DOCKET NUMBER <b>11005030</b>	ADAMS ACCESSION NUMBER <b>ML5362A440</b>	<input checked="" type="checkbox"/> PUBLIC    OR <input type="checkbox"/> NON-PUBLIC
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**PART D. TO BE COMPLETED FOR IMPORT LICENSES, AMENDMENTS, OR RENEWALS**  
(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12. NAME(S) / ADDRESS(ES) OF FOREIGN SUPPLIERS AND/OR OTHER PARTIES TO IMPORT	13. NAME(S) / ADDRESS(ES) OF INTERMEDIATE CONSIGNEE(S)	14. NAME(S) / ADDRESS(ES) OF ULTIMATE U. S. CONSIGNEE(S)
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12a. NRC EXPORT LICENSE NUMBER(S) <i>(if applicable)</i>	13a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	14a. LICENSE NUMBER(S) / EXPIRATION DATE(S)
	13b. INTERMEDIATE USE(S)	14b. ULTIMATE END USE(S)


15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)	15b. MAX ENRICHMENT OR WGT %	15c. MAX ISOTOPE WGT (KG)
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16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)

**PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR CONSENT REQUEST(S)**

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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**18. CERTIFICATION:** I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.

18a. PRINT NAME AND TITLE OF AUTHORIZED OFFICIAL Erin P. McBride-Lovas, Trade Compliance Specialist	18b. SIGNATURE -- AUTHORIZED OFFICIAL 	18c. DATE 6/11/15
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Addendum to Amendment and Renewal Application for ACDM1113, Amendment No. 2, Ultimate Consignees (Continuation of Previously Submitted NRC Form 7 Box 9.)		Contact Name & Title	Tel	Email
No.	Plant Name	Full Name	Address	
1	CNNC Qinshan Nuclear Power Co., Limited	CNNC Qinshan Nuclear Power Co., Limited	Haiyan, Zhejiang 314300, China	
2	CNNC Qinshan Nuclear Power Co., Limited	CNNC Qinshan Nuclear Power Co., Limited	Haiyan, Zhejiang 314300, China	
3	CNNC Nuclear Power Qinshan Joint Venture Co., Limited	CNNC Nuclear Power Qinshan Joint Venture Co., Limited	Haiyan, Zhejiang 314300, China	
4	CNNC Third Qinshan Nuclear Power Co., Limited	CNNC Third Qinshan Nuclear Power Co., Limited	Haiyan, Zhejiang 314300, China	
5	CNNC Jiangsu Nuclear Power Co., Limited	CNNC Jiangsu Nuclear Power Co., Limited	No. 28, Haitang Middle Road, Lianyungang 222042, China	
6	CNNC Sanmen Nuclear Power Co., Limited	CNNC Sanmen Nuclear Power Co., Limited	Sanmen Nuclear Power Company, Sanmen 317112, China	
7	CNNC Fujian Nuclear Power Co., Limited	CNNC Fujian Nuclear Power Co., Limited	Construction Bank Building, Qingchang Road, Fuzing 350300, China	
8	CNNC Hunan Taohuajiang Nuclear Power Co., Limited	CNNC Hunan Taohuajiang Nuclear Power Co., Limited	No. 35, Changyi Road, Yiyang, Hunan Province, 413000, China	
9	CNNC Hainan Nuclear Power Co., Ltd.	CNNC Hainan Nuclear Power Co., Ltd.	No. 3 Binmiao Road, Binhai Avenue, Haitou, Hainan, 570125, China	
10	CNNC Liaoning Nuclear Power Co., Ltd.	CNNC Liaoning Nuclear Power Co., Ltd.	Wenxin Bld, Xinghaiyuanlu, Xingcheng, Liaoning Province, 125100, China	
11	CNNP Guangdong Zhongzhou Energy Co., Ltd.	CNNP Guangdong Zhongzhou Energy Co., Ltd.	6th Flr, China Telecom Bld, Pumen, Yunxiao, Zhangzhou, Fujian, 363300 China	
12	CNNP CHD Hebei Nuclear Power Co. Ltd	CNNP CHD Hebei Nuclear Power Co. Ltd	3rd flr, Bank of China Bld, Haihengrd, Haizing, Cangzhou, Hebei Province, 061200, China	
13	Daya Bay Nuclear Power Operation and Management co Ltd.	Daya Bay Nuclear Power Operation and Management co Ltd.	01 Building, Daya Bay Nuclear Power Base, Shenzhen, Guangdong, 518124, China	
14	Daya Bay Nuclear Power Operation and Management co. Ltd.	Daya Bay Nuclear Power Operation and Management co. Ltd.	01 Building, Daya Bay Nuclear Power Base, Shenzhen, Guangdong, 518124, China	
15	Xianning Nuclear Power Co., Limited	Xianning Nuclear Power Co., Limited	Daidan Town, Tongshan, Xianning 437642, Hubei China	
16	CGN Lufeng Nuclear Power Co., Limited	CGN Lufeng Nuclear Power Co., Limited	Haining Road, City Area, Shanwei, Guangdong, China	
17	Yangjiang Nuclear Power Co., Limited	Yangjiang Nuclear Power Co., Limited	Sunshine Garden, Yangjiang, Guangdong, 529500 China	
18	Liaoning Hongyanhe Nuclear Power Co. Ltd.	Liaoning Hongyanhe Nuclear Power Co. Ltd.	Nuclear Power Building, No.127, Nanhanlu, Zhongshan, Dalian, Liaoning, 116001 China	
19	Fujian Ningde Nuclear Power Co. Ltd.	Fujian Ningde Nuclear Power Co. Ltd.	CCB Building, Yuwanlu, Gangkou, Fangchenggang, Guangxi, 538000 China.	
20	Guangxi Fangchenggang Nuclear Power Co. Ltd	Guangxi Fangchenggang Nuclear Power Co. Ltd	Nuclear Power Building, No.266 Jiangbin大道, Fuding, Fujian, 355200 China	
21	Shandong Nuclear Power Co. Rd.	Shandong Nuclear Power Co. Rd.	Hayang Nuclear Power Plant, Haiyang, Yantai, Shandong, 265114 China.	
22	State Nuclear Power Demonstration Project Co., Ltd.	State Nuclear Power Demonstration Project Co., Ltd.	SNPP, Ningjiao, Shidao, Rongcheng, Weihai, Shandong Province, 264312 China	
23	CPI Jiangxi Nuclear Power Co. Ltd.	CPI Jiangxi Nuclear Power Co. Ltd.	15th Flr, Jiujiang Bank Bld, No.619 Changhong Rd, Jiujiang, Jiangxi Province, 332009, China	

This document is the property of and contains Proprietary information owned by Westinghouse Electric Company LLC and/or its subcontractors and suppliers. It is transmitted to you in confidence and trust, and you agree to treat this document in strict accordance with the terms and conditions of the agreement under which it was provided to you.



Addendum to Amendment and Renewal Application for XCOM1111, Amendment No. 2 Intermediate Consignees (Continuation of Previously Submitted NRC Form 7 Box 8.)

No.	Full Name	Address	Contact Name	Tel	Email
1	Westinghouse Electric Company Brussels	Blue Tower, Avenue Louise 326-Box 60, 18th Floor, 1050 Brussels, Belgium			
2	Westinghouse European Service Center	rue de l'Industrie 43, 1400 Nivelles, Belgium			
3	China Nuclear Energy Industry Corporation (CNEIC)	No. 9, Huayuan Street, Xicheng District Beijing 100032, People's Republic of China			
4	Yibin Nuclear Fuel Element Plant	No.273, Yibin, Sichuan, 644000, China			
5	Baotou Nuclear Fuel Assembly Plant	P.O. Box 456, 202, Chaoyanglu, Wusutu, Qimshan District, Baotou, Inner Mongolia, 014035, China			
6	KSB, Germany	KSB Aktiengesellschaft Johann-Klein-Strabe, 9 67227 Frankenthal, Germany			
7	Curtiss Wright EMD	1000 Wright Way, Cheswick, PA 15024			
8	IHI, Japan	Toyosu IHI Bldg., 1-1, Toyosu 3-chome, Koto-ku, Tokyo 135-8710, Japan			
9	Toshiba, Japan	1-1, Shibaura 1-chome, Minato-ku, Tokyo 105-8001, Japan			
10	Westinghouse Mangiorotti (SP)	Via Timavo 59, 34074 Montalcone, Gorizia, Italy			
11	Shanghai Number 1 (SN01)	185 Yitian Road, Lingang, Pudong New District, Shanghai PRC 201308			
12	Shanghai Electric Corporation (SEC)	77 Cenglin Road, Lingang, Pudong New District, Shanghai PRC 201308			
13	Dongfang Electric Company (DEC)	333 Shuhan Road, Jinniu District, Chengdu, Sichuan, China 610036			
14	Harbin Electric Company (HEC), Harbin, China	5 Dongli Road, Qinhuaogdao Economic Zone, Hei Bei, China 066206			
15	State Nuclear Power Technology Company (SNPTC)	Building No.1, Compound No.29, North 3rd Ring, Xicheng District, Beijing.			
16	State Nuclear Power Engineering Company (SNPEC)	Building 2, No. 888 Tianlin Road, Minhang District, Shanghai, 200233, China			
17	Shanghai Nuclear Engineering Research & Design Institute (SNERI)	No.29 Hongcao Road, Shanghai, 200233, China			
18	State Nuclear Power Automation System Engineering Company (SNPAS)	Building 6 (east), No. 888 Tianlin Road, Shanghai, China. 200233			
19	State Nuclear Power Engineering Mechanical Company (SNPEMC)	Lingang Industry Zone, Haiyang, Shandong, 265118 China			
20	China Nuclear Power Engineering Company (CNPE)	No. 117, Xianhuanbeilu, Haidian District, Beijing, 100840, China			
21	Nuclear Power Institute of China (NPIC)	328, Changshun Avenue 1, Shuangliu, Chengdu, Sichuan, China			
22	China Nuclear Power Engineering Company (CNPEC)	AE Building, Daya Bay Nuclear Power Base, Shenzhen, Guangdong, 518124, China			
23	China Nuclear Power Design Company (CNPDC)	Science Technology Building, Shangbu Middle Road, Shenzhen 518031, China			
24	China Nuclear Power Research Institute (CNPRI)	13 Flr, Jiangsu Building, Yitianlu, Futian, Shenzhen Guangdong, 518026 China			
25	Doosan Industries	29 Doosan Volvo-ro, Seongsan-Gu, Changwon, Gyeongnam, 642-792, Republic of Korea			
26	ABB Sweden	Kopparbergsvagen 2, 220 (Nore), Vaesterås, 721 83 Vastmanlands lan, Sweden			
27	Exton Industries, USA	1000 Eaton Boulevard, Eaton House, 30 Pembroke Road, Cleveland, Ohio 44122			
28	Mirion Technologies Corporation, USA	3000 Executive Parkway, Suite 222, San Ramon, CA 94583			
29	Mirion Technologies Corporation, Canada	465 Dobbie Drive, Cambridge, Ontario, N1R 5X9 Canada			
30	Equipos Nucleares, S.A. (ENSA)	Avenida Juan Carlos I, 8, 39600 Mallano, Cantabria, Spain			
31	State Nuclear Bao Ti Zirconium Industry Company (SNZ)	No.206, Gaoxin Avenue, Baoji, Shanni, 721013,China			
32	China Nuclear Power Operation Co., Ltd. (CNOC)	01 Building, Daya Bay Nuclear Power Site, Shenzhen, Guangdong, China 518122			
33	China Nuclear Power Operation Management Co., Ltd. (CNNO)	Qinshan Nuclear Power site, Haiyan, Zhejiang, China. 314300			

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Westinghouse Electric Company  
1000 Westinghouse Drive  
Cranberry Township, PA 16066  
USA

Deputy Director  
Office of International Programs  
11555 Rockville Pike  
Mail Station 04D2  
U.S. Nuclear Regulatory Commission  
Rockville, Maryland 20852-2738

Direct tel: 724-940-8198  
Direct fax: 724-940-8508  
e-mail: mcbride@westinghouse.com

Your ref: Renewal & Amendment of  
XCOM 1111, Amendment  
Number 2  
Our ref: EML-15-050

6/11/2015

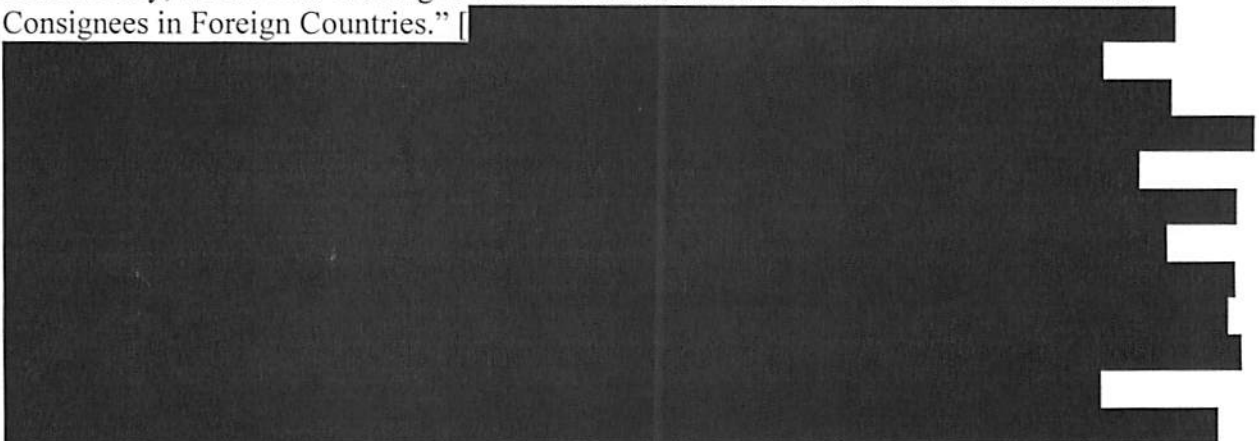
RE: Renewal & Amendment of XCOM 1111, Amendment Number 2

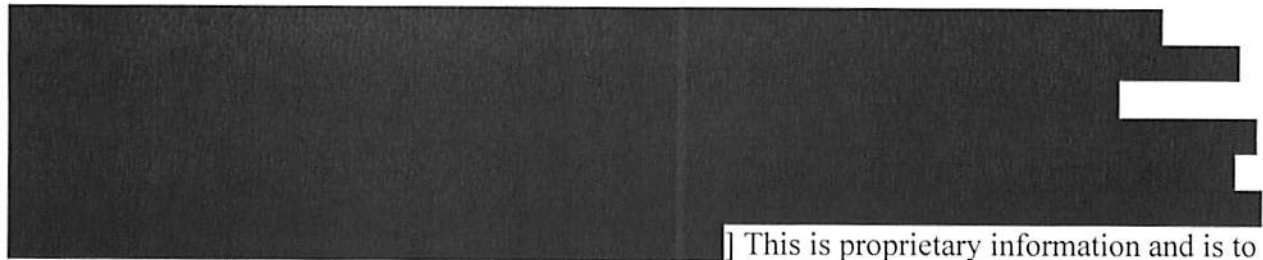
Dear Deputy Director,

Please find an NRC export license application, enclosed, to renew and amend the current export license XCOM 1111, Amendment Number 2. This application requests to renew this license past its current expiry date of July 23, 2015 until 20 years from that date.

As the license currently covers the export of nuclear systems and components under 10 CFR 110, Appendix A, Paragraphs (5)-(9), we would like to change that to include the now expanded Appendix A, Paragraphs (5)-(11). We are also requesting that our address be updated to reflect our current location under the "Licensee" box.

Additionally, we are also looking to add "Various Entities in China" under "Intermediate Consignees in Foreign Countries." [





This is proprietary information and is to remain confidential as per the attached Application for Withholding Proprietary Information from Public Disclosure and an Affidavit in conformance with the requirements of 10 CFR Section 2.390. No other changes to the license are requested at this time.

A check for \$1,400 to cover the NRC export license renewal and amendment application fee for the license is also enclosed.

Should there be any questions on this request, please call the undersigned at 724-940-8198.

Thank you for your attention to this request.

Sincerely,

Erin P. McBride-Lovas  
Trade Compliance Group  
Legal Department  
Westinghouse Electric Company LLC





Westinghouse Electric Company  
1000 Westinghouse Drive  
Cranberry Township, Pennsylvania 16066  
USA

U.S. Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Direct tel: (412) 374-4643  
Direct fax: (724) 940-8560  
e-mail: greshaja@westinghouse.com

LTR-NRC-15-103

December 4, 2015

**Subject:** Submittal of Westinghouse Letter EML-15-210, "Addendum to the Renewal & Amendment Application for XCOM 1111, Amendment Number 2" and attachments "Addendum to Amendment and Renewal Application for XCOM1111, Amendment No. 2 Ultimate Consignees (Continuation of Previously Submitted NRC Form 7 Box 9.)" and "Addendum to Amendment and Renewal Application for XCOM1111, Amendment No. 2 Intermediate Consignees (Continuation of Previously Submitted NRC Form 7 Box 8.)" (Proprietary/Non-Proprietary)

Enclosed are the proprietary and non-proprietary versions of report EML-15-210, "Addendum to the Renewal & Amendment Application for XCOM 1111, Amendment Number 2" and Attachments "Addendum to Amendment and Renewal Application XCOM1111, Amendment No. 2 Ultimate Consignees (Continuation of Previously Submitted NRC Form 7 Box 9.)" and "Addendum to Amendment and Renewal Application XCOM1111, Amendment No. 2 Intermediate Consignees (Continuation of Previously Submitted NRC Form 7 Box 8.)"

Also enclosed are:

1. An Application for Withholding Proprietary Information from Public Disclosure, AW-15-4342 (Non-Proprietary), with Proprietary Information Notice and Copyright Notice
2. An Affidavit (Non-Proprietary).

This submittal contains proprietary information of Westinghouse Electric Company LLC. In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Commission's regulations, we are enclosing with this submittal an Application for Withholding Proprietary Information from Public Disclosure and an Affidavit. The Affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference AW-15-4342 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.

A handwritten signature in black ink, appearing to read 'J. A. Gresham'.

James A. Gresham, Manager

Regulatory Compliance

Enclosures



Westinghouse Electric Company  
1000 Westinghouse Drive  
Cranberry Township, Pennsylvania 16066  
USA

U.S. Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Direct tel: (412) 374-4643  
Direct fax: (724) 940-8560  
e-mail: greshaja@westinghouse.com

AW-15-4342

December 4, 2015

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

**Subject:** LTR-NRC-15-103 P-Attachment, Westinghouse Letter EML-15-210, "Addendum to the Renewal & Amendment Application for XCOM 1111, Amendment Number 2" and attachments "Addendum to Amendment and Renewal Application for XCOM1111, Amendment No. 2 Ultimate Consignees (Continuation of Previously Submitted NRC Form 7 Box 9.)" and "Addendum to Amendment and Renewal Application for XCOM1111, Amendment No. 2 Intermediate Consignees (Continuation of Previously Submitted NRC Form 7 Box 8.)" (Proprietary)

**Reference:** Letter from James A. Gresham to Document Control Desk, LTR-NRC-15-103, dated December 4, 2015

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 strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit AW-15-4342 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.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the accompanying Affidavit should reference AW-15-4342 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.

A handwritten signature in black ink, appearing to read 'James A. Gresham', written in a cursive style.

James A. Gresham, Manager  
Regulatory Compliance




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.

  
\_\_\_\_\_  
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.
- 
- (vi) 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 Westinghouse Letter EML-15-210, "Addendum to the Renewal & Amendment Application for XCOM1111, Amendment Number 2" and attachments "Addendum to Amendment and Renewal Application for XCOM 1111, Amendment Number 2 Ultimate Consignees (Continuation of Previously Submitted NRC Form 7 Box 9.)" and "Addendum to Amendment and Renewal Application for XCOM1111, Amendment Number 2 Intermediate Consignees (Continuation of Previously Submitted NRC Form 7 Box 9.)" (Proprietary), for submittal to the Commission, being transmitted by Westinghouse letter, LTR-NRC-15-103, 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 renewal and

amendment of Westinghouse's XCOM1111, Amendment Number 2 NRC Export License, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
  - (i) Maintain a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
  
- (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 to maintain its competitive position against its competitors, which if able to learn this commercial information would know customers and commercial strategies of Westinghouse.
  - (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 competing products for commercial power reactors full knowledge of Westinghouse's customers and their contact information. 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 the Addendum prepared by Westinghouse for its Application to the NRC for the Amendment and Renewal of Export License XCOM1111, Amendment Number 2, as described in Westinghouse letter, "Addendum to the Renewal & Amendment Application for XCOM 1111, Amendment Number 2" and attachments "Addendum to Amendment and Renewal Application for XCOM1111, Amendment No. 2 Ultimate Consignees (Continuation of Previously Submitted NRC Form 7 Box 9.)" and "Addendum to Amendment and Renewal Application for XCOM1111, Amendment No. 2 Intermediate Consignees (Continuation of Previously Submitted NRC Form 7 Box 8.)."

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