



April Rice  
Manager  
New Nuclear Licensing

February 3, 2016  
NND-16-0019  
10 CFR 52.97

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

Virgil C. Summer Nuclear Station (VCSNS) Unit 2  
Docket Number 52-027  
Combined License Number NPF-93

Subject: Submittal of the AP1000 Preservice Inspection Program Plan for VCSNS Unit 2

This submission is made with regard to the V.C. Summer, Unit 2, Combined License (COL) Number NPF-93, pursuant to 10 CFR 50.55a(g), and as required by the VCSNS Units 2&3 Updated Final Safety Analysis Report (UFSAR), Subsection 5.2.4.

SCE&G hereby submits the Preservice Inspection Program Plan for V.C. Summer Unit 2, VS2-GW-GEI-100, Revision 0, (Proprietary) and VS2-GW-GEI-101, Revision 0 (Non-Proprietary) as Enclosure 3. Enclosure 1 and 2 provides the basis for withholding of proprietary information.

The PSI program plan has been developed based on controlled drawings issued as of May 2014, and color-coded AP1000 Piping and Instrumentation Diagrams (P&IDs) issued in October 2011. As the V.C. Summer Unit 2 design and field fabrication progresses, changes will be required to these documents to reflect design changes and as-built conditions. As such, the PSI Plan and associated documents will be revised and updated under procedure controls as inspections are implemented in the field.

As discussed above, Enclosure 3 contains proprietary information that Westinghouse and SCE&G request to be withheld from public disclosure under 10 CFR 2.390. An affidavit from SCE&G supporting withholding under 10 CFR 2.390 is provided as Enclosure 1. Enclosure 2 is Westinghouse's Proprietary Information Notice, Copyright Notice and CAW-15-4269, Application for Withholding Proprietary Information from Public Disclosure and Affidavit. The affidavits set forth the bases upon 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 that is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR 2.390. The redacted (non-proprietary) version of the VCSNS Unit 2 PSI Program Plan is provided in Enclosure 4 and is suitable for public disclosure.

Correspondence with respect to the copyright or proprietary aspects of the items described above or the supporting affidavits should reference CAW-15-4269 and should be addressed to James A Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000

D083  
NRD

Westinghouse Drive, Building 3 Suite 310, Cranberry Township, PA 16066. Correspondence with respect to proprietary aspects of this letter and its enclosures should also be addressed to Mr. Richard Troficanto at PO Box 88, MC 845, Jenkinsville, SC 29065.

This letter contains no regulatory commitments.

Should you have any questions regarding this letter, please contact Justin Bouknight by telephone at (803) 941-9828, or by email at [justin.bouknight@scana.com](mailto:justin.bouknight@scana.com).

Sincerely,



April Rice  
Manager  
New Nuclear Licensing

BB/ARR/bb

Enclosure 1: Affidavit for Withholding SCE&G's Information Under 10CFR 2.390

Enclosure 2: Westinghouse Authorization Letter CAW-15-4269, Affidavit, Proprietary Information Notice and Copyright Notice

Enclosure 3: DVD containing VS2-GW-GEI-100, Revision 0, (Proprietary)

Enclosure 4: DVD containing VS2-GW-GEI-101, Revision 0 (Non-Proprietary)

c (with enclosures):

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**South Carolina Electric & Gas**

**NND-16-0019**

**Enclosure 1**

**Affidavit for Withholding SCE&G's Information**

**Prepared in Accordance with 10 CFR 2.390**

### Affidavit of April Rice

1. My name is April R. Rice. I am the Manager, Nuclear Licensing, for South Carolina Electric and Gas Company (SCE&G). I have been delegated the function of reviewing proprietary information sought to be withheld from public disclosure and am authorized to apply for its withholding on behalf of SCE&G.

2. I am making this affidavit on personal knowledge, in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations, and in conjunction with SCE&G's filings on docket 52-027 related to the Preservice Inspection Program Plan for VCSNS Unit 2. I have personal knowledge of the criteria and procedures used by SCE&G to designate information as a trade secret, privileged, or as confidential commercial or financial information.

3. Based on the criteria in 10 CFR 2.390(a)(4), this affidavit seeks to withhold from public disclosure Enclosure 3 of SCE&G's Submittal of the AP1000 Preservice Inspection Program Plan for VCSNS Unit 2, NND-16-0019.

4. The following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.

a. The information sought to be withheld from public disclosure has been held in confidence by SCE&G and Westinghouse Electric Company.

b. The information is of a type customarily held in confidence by SCE&G and Westinghouse and not customarily disclosed to the public.

c. The release of the information might result in the loss of an existing or potential competitive advantage to SCE&G and/or Westinghouse.

d. Release of the information may harm SCE&G because SCE&G has a contractual relationship with the Westinghouse Electric Company regarding proprietary information. SCE&G is contractually obligated to seek confidential and proprietary treatment of the information.

5. To satisfy the requirements of 10 CFR 2.390(b)(1)(i)(B) and (b)(1)(ii)(E), a non-proprietary version of Enclosure 3 can be found in Enclosure 4 of SCE&G's Submittal of the AP1000 Preservice Inspection Program Plan for VCSNS Unit 2, NND-16-0019. Withheld information is bracketed with superscripts of [a, b, and/or c], to indicate the following reasons for withholding:

(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.

6. The proprietary information for which withholding is being requested in the above-referenced submittal is further identified in Affidavit CAW-15-4269 (Enclosure 2).
7. 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.
8. To the best of my knowledge and belief, 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.

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

April R. Rice  
April R. Rice)

Executed on February 3, 2016  
Date

SWORN and SUBSCRIBED to before me on this 3<sup>rd</sup> day of February, 2016 in Jenkinsville county, South Carolina.

Tamela D. Cohen

Notary Public

My Commission Expires: April 15, 2023



**South Carolina Electric & Gas**

**NND-16-0019**

**Enclosure 2**

**Westinghouse Authorization Letter CAW-15-4269,  
Affidavit, Proprietary Information Notice and Copyright Notice**



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

Document Control Desk  
U S Nuclear Regulatory Commission  
Washington, DC 20852-2738

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Proj letter: VSP\_VSG\_003731

CAW-15-4269

November 12, 2015

APPLICATION FOR WITHHOLDING PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Transmittal of V.C. Summer Unit 2 Preservice Inspection (PSI) Program Plan

The proprietary information for which withholding is being requested in the above-referenced application is further identified in Affidavit CAW-15-4269 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 South Carolina Gas & Electric Company.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-15-4269, 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 cursive script that reads "Paul A. Russ".

Paul A. Russ, Director

U.S. Licensing & Regulatory Support

/Enclosures



CAW-15-4269  
November 12, 2015

1. Affidavit, Proprietary Information Notice, Copyright Notice, dated November 12, 2015
2. VS2-GW-GEI-100 Revision 0, "AP1000 Preservice Inspection Program Plan for V.C. Summer Unit 2" (Proprietary)
3. VS2-GW-GEI-101 Revision 0, "AP1000 Preservice Inspection Program Plan for V.C. Summer Unit 2" (Non-Proprietary)

CAW-15-4269  
November 12, 2015

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

I, Paul A. Russ, 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.



Paul A. Russ, Director

U.S. Licensing & Regulatory Support

- (1) I am Director, U.S. Licensing & Regulatory Support, 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.
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- (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 VS2-GW-GEI-100 Revision 0, "AP1000 Preservice Inspection Program Plan for V.C. Summer Unit 2" (Proprietary), for submittal to the Commission, being transmitted by South Carolina Electric & Gas 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 the NRC review of the AP1000 Preservice Inspection Program Plan for V.C. Summer Unit 2, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
  - (i) Manufacture and deliver products to utilities based on proprietary designs.
  
- (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 licensing of new nuclear power stations.
  - (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/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.

**South Carolina Electric & Gas**

**NND-16-0019**

**Enclosure 3**

**DVD containing the VCSNS Unit 2 PSI Program Plan**

**(VS2-GW-GEI-100, Revision 0)**

**(Proprietary)**



**South Carolina Electric & Gas**

**NND-16-0019**

**Enclosure 4**

**DVD containing the VCSNS Unit 2 PSI Program Plan**

**(VS2-GW-GEI-101, Revision 0)**

**(Non-Proprietary)**