



Program Management Office  
102 Addison Road  
Windsor, Connecticut 06095

WDI-TJ-006-03-P/NP, Rev 4  
Project Number 694

January 4, 2010

OG-10-2

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

Subject: PWR Owners Group  
**For Information Only – Technical Justification Document WDI-TJ-006-03-P/NP, Rev 4, “Ultrasonic Testing of Interference Fit Samples for Leak Path Detection”, PA-MS-0532**

This letter transmits four (4) proprietary and two (2) non-proprietary copies of Technical Justification Document WDI-TJ-006-03-P/NP, Rev 4, “Ultrasonic Testing of Interference Fit Samples for Leak Path Detection” developed by Westinghouse under PA-MS-0532 and EPRI letter MRP 2009-047. These documents are being submitted for information only. As such, no review fee or separate Safety Evaluation (SE) is expected.

On March 17, 2009 representatives from the PWROG, NEI, EPRI, MRP and Westinghouse had an information meeting with NRR to discuss the industry response to the requirement to demonstrate the volumetric (UT) leak path technique as set forth in 10CFR50.55a) dated September 10, 2008. At this meeting, it was presented that the PWROG had undertaken a project to develop a technical justification in accordance with ASME V Article 14 and that EPRI would perform an independent review of the technical justification document. In addition, EPRI agreed to augment the blind testing requirement for ultrasonic testing data analyst personnel with leak path samples. A commitment was made that the PWROG technical justification report and the EPRI review would be provided to the NRC. The blind testing of data analysts is currently underway and does include leak path test samples.

The PWROG project includes separate technical justifications from Westinghouse (WesDyne) and AREVA. At this time, the Westinghouse portion is complete and is being transmitted. The AREVA portion will be transmitted at a later date.

Also enclosed is Westinghouse authorization letter CAW-09-2691, accompanying affidavit, Proprietary Information Notice, and Copyright Notice.

*Designated as original 12/30/2016*

*Jonathan Rowley*

*Jonathan Rowley*

*D048*

*NRR*

WDI-TJ-006-03-P, Revision 4 contains information proprietary to Westinghouse Electric Company LLC; it is supported by an affidavit signed by Westinghouse, owner of the information. The affidavit 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 Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that this 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 information listed above or supporting Westinghouse affidavit should reference CAW-09-2691 and should be addressed to Mr. J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Correspondence related to this transmittal should be addressed to:

Mr. Anthony Nowinowski  
Manager, Owners Group Program Management Office  
Westinghouse Electric Company  
Mail Stop ECE 5-16  
P.O. Box 355  
Pittsburgh, Pennsylvania 15230-0355

If you have any questions, please do not hesitate to contact me at 254-897-5851 or Mr. Anthony Nowinowski of the Owners Group Program Management Office at 412-374-6855.

Sincerely yours,



Dennis E. Buschbaum, Chairman  
PWROG Owners Group

DEB:JPM:las

Enclosures:

1. Four (4) proprietary copies of Technical Justification Document WDI-TJ-006-03-P, Rev 4, "Ultrasonic Testing of Interference Fit Samples for Leak Path Detection".
2. Two (2) non-proprietary copies of Technical Justification Document WDI-TJ-006-03-NP, Rev 4, "Ultrasonic Testing of Interference Fit Samples for Leak Path Detection".
3. One copy of the Application for Withholding, CAW-09-2691 (Non-proprietary) with Proprietary Information Notice and Copyright Notice.
4. One copy of Affidavit (Non-proprietary).

cc: PWROG Management Committee  
PWROG Steering Committee  
PWROG Materials Subcommittee  
PWROG Licensing Subcommittee  
PWROG PMO  
J. Rowley, USNRC  
T. Chan, USNRC  
J. Spanner, EPRI  
T. McAlister, SCE&G  
J. Gresham, Westinghouse  
J. Lareau, Wesdyne  
D. Adamonis, Wesdyne  
R. Devlin, Wesdyne  
M. Concordia, Wesdyne



**Westinghouse**

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CAW-09-2691

December 17, 2009

APPLICATION FOR WITHHOLDING PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE

**Subject: WDI-TJ-006-03-P, Rev. 4, "Ultrasonic Testing of Interference Fit Samples for Leak Path Detection" (Proprietary)**

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-09-2691 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 the Pressurized Water Reactor Owners Group (PWROG).

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-09-2691 and should be addressed to the undersigned.

Very truly yours,

*for* J. A. Gresham, Manager  
Regulatory Compliance and Plant Licensing

Enclosures

bcc: M. Stofko (Windsor)  
R. Bastien, 1L, 1A (Nivelles, Belgium)  
L. Ulloa (Madrid, Spain) 1L, 1A  
C. Brinkman, 1L, 1A (Westinghouse Electric Co., 12300 Twinbrook Parkway, Suite 330, Rockville, MD 20852)  
RLE Administrative Aide (ECE 4-7A) 1L, 1A (letters w/affidavits only)

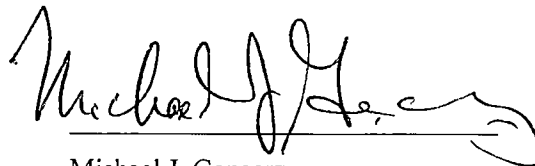
AFFIDAVIT

STATE OF CONNECTICUT:

SS

COUNTY OF HARTFORD:

Before me, the undersigned authority, personally appeared Michael J. Gancarz, who, being by me duly sworn according to law, deposes and says that he is 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 his knowledge, information, and belief:



Michael J. Gancarz,  
Product Manager  
Systems and Equipment Engineering II

Sworn to and subscribed  
before me this 17<sup>th</sup> day  
of December, 2009



Notary Public

My Commission Expires: 8/31/2014

- (1) I am Product Manager, Systems and Equipment Engineering II, in Nuclear Services, 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 the Westinghouse Electric Company LLC.
- (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 accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by the Westinghouse Electric Company LLC 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.

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.
- (iii) 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.
- (iv) 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.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WDI-TJ-006-03-P, Rev. 4, "Ultrasonic Testing of Interference Fit Samples for Leak Path Detection" and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted for use by Westinghouse Electric Company LLC for the Pressurized Water Reactor Owners Group (PWROG) is expected to be applicable for multiple licensee submittals in response to certain NRC requirements for ultrasonic inspections of nuclear power plant structures, systems or components.

This information will enable Westinghouse to provide ultrasonic inspection services for nuclear power plant structures, systems or components to various utilities. The information justifies the feasibility of using an existing inspection technique for

inspecting control rod drive mechanism reactor pressure vessel head penetrations as a method for detecting leak paths in the head material, thereby assisting, if the information were available, competitors to devise similar inspection techniques that utilities may regard as more suitable for existing plant layouts.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of ultrasonic inspection services to its customers.
- (b) The information requested to be withheld reveals the distinguishing aspects of a product 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 products for commercial power reactors without commensurate expenses.

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.

Letter for Transmittal to the NRC

The following paragraphs should be included in your letter to the NRC:

Enclosed are:

1. 1 copy of WDI-TJ-006-03-P, Rev. 04, "Ultrasonic Testing of Interference Fit Samples for Leak Path Detection" (Proprietary)
2. 1 copy of WDI-TJ-006-03-P, Rev. 04, "Ultrasonic Testing of Interference Fit Samples for Leak Path Detection" (Non-proprietary)

Also enclosed are a Westinghouse authorization letter, CAW-09-2691, accompanying affidavit, Proprietary Information Notice, and Copyright Notice.

As Item 1 contains information proprietary to Westinghouse Electric Company, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit 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 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 items listed above or the supporting Westinghouse Affidavit should reference CAW-09-2691 and should be addressed to: J. A. Gresham, Manager of Regulatory Compliance and Plant Licensing, Westinghouse Electric Company, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.