



Program Management Office  
20 International Drive  
Windsor, Connecticut 06095

Project Number 694

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OG-17-332

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

Subject: PWR Owners Group  
**Transmittal of the PWROG Meeting Materials from the November 8, 2017  
NRC/PWROG Pre-Submittal Meeting for BAW-2192-P Supplement 1 and  
BAW-2178-P Supplement 1 (PA-MS-1481)**

References:

1. BAW-2192-P Supplement 1, Low Upper-Shelf Toughness Fracture Mechanics Analysis of Reactor Vessels of B&W Owners Reactor Vessel Working Group for Levels A & B Service Loads
2. BAW-2178-P Supplement 1, Low Upper-Shelf Toughness Fracture Mechanics Analysis of Reactor Vessels of B&W Owners Reactor Vessel Working Group for Levels C & D Service Loads

The purpose of this letter is to transmit the PWR Owners Group meeting materials that were discussed via teleconference in the November 8, 2017 NRC/PWROG pre-submittal meeting, presentation "Linde 80 Weld Low Upper-Shelf Toughness Fracture Mechanics Testing and Analysis, PA-MS-1481" (Enclosure 1). Enclosure 2 is the accompanying AREVA affidavit.

The enclosed presentation material (Enclosure 1) contains information proprietary to AREVA Inc; it is supported by an affidavit signed by AREVA, 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 AREVA be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the proprietary aspects of the information or supporting AREVA affidavit should reference this letter and should be addressed to Mr. Philip Opsal, Manager, Product Licensing, AREVA Inc., 3315 Old Forest Road, Lynchburg, Virginia 24506-0935.

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Correspondence related to this transmittal should be addressed to:

Mr. W. Anthony Nowinowski, Program Manager  
PWR Owners Group, Program Management Office  
Westinghouse Electric Company  
1000 Westinghouse Drive  
Cranberry Township, PA 16066

If you have any questions, please do not hesitate to contact me at (205) 992-7037 or Mr. W. Anthony Nowinowski, Program Manager of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely yours,

*D. Page Blair Approving for J. Stringfellow*

Jack Stringfellow  
Chief Operating Officer & Chairman  
Pressurized Water Reactor Owners Group

NJS:DRPB:am

cc with enclosures:

B. Benney, US NRC  
B. Watson, AREVA  
PWROG Materials Committee Representatives in MSC-1481

cc without enclosures:

PWROG Steering and Management Committee  
PWROG PMO  
E. Dorman, AREVA  
J. Fleck, AREVA  
B. Haibach, AREVA  
P. Thallapragada, AREVA  
D. Page Blair, AREVA  
P. Opsal, AREVA

Enclosure 1: Presentation - "Linde 80 Weld Low Upper-Shelf Toughness Fracture Mechanics Testing and Analysis, PA-MS-1481" (Proprietary)  
Enclosure 2: Affidavit for Proprietary Information PA-MS-1481 Presentation on 11-8-2017

A F F I D A V I T

COMMONWEALTH OF VIRGINIA    )  
  ) ss.  
CITY OF LYNCHBURG                )

1.       My name is Philip A. Opsal. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2.       I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3.       I am familiar with the AREVA information contained in the following document: "Linde 80 Weld Low Upper-Shelf Toughness Fracture Mechanics Testing and Analysis, PA-MS-C-1481" referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. for the control and protection of proprietary and confidential information.

4.       This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5.       This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c) and 6(d) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

*Sherry L. McFaden*

SUBSCRIBED before me this 7<sup>th</sup>  
day of November, 2017.

*Sherry L. McFaden*

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/18  
Reg. # 7079129

