

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Jaime H. McCoy
Vice President Engineering

January 29, 2018

ET 18-0004

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- Reference: 1) Letter ET 17-0001, dated January 17, 2017, from J. H. McCoy, WCNOC, to USNRC
- 2) Letter ET 17-0016, dated July 13, 2017, from J. H. McCoy, WCNOC, to USNRC
- 3) Letter WO 18-0004, dated January 15, 2018, from C. O. Reasoner, WCNOC, to USNRC

Subject: Docket No. 50-482: Supplement to License Amendment Request to Revise Technical Specifications to Transition to Westinghouse Core Design and Safety Analysis Including Adoption of Alternative Source Term

To Whom It May Concern:

Reference 1 provided the Wolf Creek Nuclear Operating Corporation (WCNOC) application to revise the Wolf Creek Generating Station (WCGS) Technical Specifications (TS). The proposed amendment would support transition to the Westinghouse Core Design and Safety Analysis methodologies. In addition, the amendment request included revising the WCGS licensing basis by adopting the Alternative Source Term radiological analysis methodology in accordance with 10 CFR 50.67, "Accident Source Term." References 2 and 3 provided responses to requests for additional information related to the application.

In Reference 2, WCNOC unintentionally provided inaccurate values in the response to the Instrument and Controls Branch (EICB) request for additional information (RAI) 1. Attachment I provides a revised response to EICB-RAI 1.

During the review of WCNOC documentation for the Safety Evaluation, the Nuclear Regulatory Commission (NRC) staff noted a discrepancy between Surveillance Requirements (SR) 3.4.1.3 and SR 3.1.4.4. Attachment II provides a description of the discrepancy and a copy of the current WCNOC TS page.

ADD 1
NRR

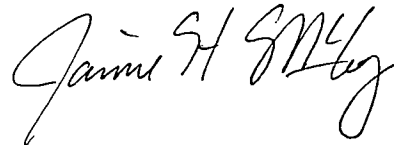
Enclosure I and II provide a revised proprietary document and affidavit to replace Enclosures II and III provided in Reference 3.

The additional information does not expand the scope of the application and does not impact the no significant hazards consideration determination presented in Reference 1.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," a copy of this submittal is being provided to the designated Kansas State official.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4156, or Cynthia R. Hafenstine at (620) 364-4204.

Sincerely,



Jaime H. McCoy

JHM/rit

Attachments: I Revised Response to Request for Additional Information for EICB-RAI 1
II Surveillance Requirement Discrepancy

Enclosures: I Attachment 2 to SAP-18-2, Revision 1, "Responses to Nuclear Regulatory Commission Request for Additional Information Regarding Wolf Creek Generating Station Transition to Westinghouse Safety Analysis and Alternate Source Term Methodologies" - Proprietary
II CAW-18-4701, Revision 1, "Application for Withholding Proprietary Information from Public Disclosure"

cc: K. M. Kennedy (NRC), w/a, w/e
B. K. Singal (NRC), w/a, w/e
K. S. Steves (KDHE), w/a (Non-Proprietary only)
N. H. Taylor (NRC), w/a, w/e
Senior Resident Inspector (NRC), w/a, w/e

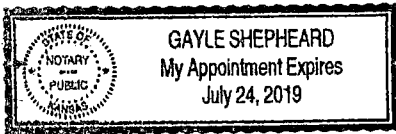
STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Jaime H. McCoy, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Jaime H. McCoy
Jaime H. McCoy
Vice President Engineering

SUBSCRIBED and sworn to before me this 29th day of January, 2018.

Gayle Shepherd
Notary Public



Expiration Date 7/24/2019

Revised Response to Request for Additional Information for EICB-RAI 1

Reference 1 provided the Wolf Creek Nuclear Operating Corporation (WCNOC) application to revise the Wolf Creek Generating Station (WCGS) Technical Specifications (TS). Reference 2 provided a request for additional information related to the application. Reference 3 provided the response to Reference 2. There were three inaccurate values in Reference 3, due to omitting a significant digit. The error has been corrected, and the response for the question in EICB-RAI 1 has been revised. This attachment provides the Revised Response to the Request for Additional Information. The specific Nuclear Regulatory Commission (NRC) question is provided in italics.

1. *EICB-RAI 1*

The LAR would replace the Allowable Value (AV) for Table 3.3.1-1 Function 10, "Reactor Coolant Flow – Low," for "Normalized Flow." This replacement is necessary for consistency with the assumptions of the new safety analysis methodology (i.e., the use of Normalized Flow, instead of design loop flow). WCAP-18083-P, Revision 0, "Westinghouse Revised Thermal Design Procedure Uncertainty Calculations for the Wolf Creek Generating Station," November 2016 (Enclosure 1 to letter dated March 22, 2017) defines the "Normalized Flow" as the reactor coolant system (RCS) flow normalization to the RCS flow calorimetric. However, it is not clear how the formula describes in the enclosure are used.

Please describe how procedurally the normalization process is carried out. The 12 hour surveillance test pertains to RCS Flow is SR 3.4.1.3, "Verify RCS total flow rate is > 3.71 x 104 gpm [gallons per minute] and greater than or equal to the limit specified in the COLR [core operating limit report]." Alternately, please provide the NRC staff with a copy of the 12 hour surveillance procedure.

Response: Two separate normalization processes are discussed within EICB-RAI 1. First, additional information is requested for the normalization process used to establish the Normalized Flow listed in TS Table 3.3.1-1 Function 10, "Reactor Coolant Flow – Low." Second, additional information is requested for how the normalization process is procedurally carried out for the 12 hour surveillance test.

Reactor Coolant Flow – Low normalization process:

Regarding the normalization process used to establish the Normalized Flow listed in TS Table 3.3.1-1 Function 10, "Reactor Coolant Flow – Low," the process is as follows. First, the output data for each of the Reactor Coolant System (RCS) flow transmitters is collected at full flow conditions, which is equivalent to 100% of indicated loop flow. This data is then used to calibrate the RCS flow transmitters in accordance with TS Surveillance Requirement (SR) 3.3.1.10. This process maintains the transmitter calibrated span to 120% of nominal flow and normalizes the output of each transmitter to full flow conditions.

After the transmitter calibration is addressed by calibrating the RCS flow transmitters to their corresponding full flow output voltage, the process cards are calibrated in accordance with SR 3.3.1.10 in order to verify that the Reactor Coolant Flow – Low bistable for each RCS flow loop will actuate once a voltage equivalent to 89.9% of the indicated loop flow is reached. Note: The nominal TS setpoint is 89.9% of indicated loop flow conditions and the Allowable Value is 88.9%

of indicated loop flow conditions; therefore, the desired calibration value is set to the nominal value rather than the allowable value. This completes the normalization process for the Reactor Coolant Flow – Low trip function.

SR 3.4.1.3 Normalization process:

With regards to the normalization process of the 12 hour surveillance test SR 3.4.1.3, "Verify RCS total flow rate is $> 37.1 \times 10^4$ gpm [gallons per minute] and greater than or equal to the limit specified in the COLR [Core Operating Limits Report]," the process is as follows. First, as part of the flow calorimetric process the RCS flow is measured. The flow calorimetric process is outlined in Enclosure II of the License Amendment Request, WCAP-18083-P. During this measurement, the reading of each of the 12 RCS flow control board indicators is recorded and then averaged. This averaged indicator RCS flow reading (%) corresponds to the RCS measured flow (gpm) determined by the calorimetric.

Next, the calculated average reading for the control board indicators (%) is normalized to the minimum measured flow value.

Note EICB-RAI 1 lists a value of 37.1×10^4 gpm; however, while this is the historical value, the minimum measured RCS flow DNB Limit is being increased to 37.6×10^4 gpm as shown in Attachment V of the License Amendment Request.

This normalization is accomplished by calculating the ratio of the minimum measured flow (gpm) to the RCS measured flow (gpm). The resulting ratio is then multiplied by the calculated average of the 12 RCS flow control board indicators (%) to obtain the average control board indicator reading (%) corresponding to the minimum measured flow. This normalization process is performed on an 18 month cycle specific frequency to meet SR 3.4.1.4.

For example:

Assume the RCS measure flow is determined via the flow calorimetric to be 391,700 gpm.

Assume the average of the 12 control board indicators is 100.25% flow.

The ratio of minimum measured flow to RCS flow is $376,000/391,700 = 0.960$

The control board indicator reading corresponding to minimum measured flow will be equal to

$$100.25\% (0.960) = 96.2\%$$

Once the average control board indicator reading corresponding to minimum measured flow is calculated, the control room shift log procedure is revised with the updated value. This completes the normalization process for SR 3.4.1.4.

The control room shift log procedure is then used to measure the control board indicator readings, average them, and compare them to the control board indicator reading corresponding to minimum measured flow to verify the SR 3.4.1.3 requirement is satisfied (i.e., in the example above, the average reading is verified to be above 96.2%). The control room shift log procedure requires that the RCS flow be verified once every 8 hours, to ensure that the 12 hour surveillance frequency is met.

Note that since the minimum measured flow value will not be changed until after the License Amendment Request (LAR) has been approved, the procedures implementing the normalization processes have not yet been revised with the new minimum measured flow value. Once the LAR is approved, the procedures will be issued with the updated value as part of the implementation effort.

References:

1. WCNOC Letter ET 17-0001, "License Amendment Request for the Transition to Westinghouse Core Design and Safety Analyses," January 17, 2017. ADAMS Accession No. ML17053B393.
2. Electronic mail from B. K. Singal, USNRC, to W. T. Muilenburg, WCNOC, "Request for Additional Information - License Amendment Request for Transition to Westinghouse Core Design and Safety Analysis Including Adoption of Alternative Source Term Wolf Creek Generating Station (CAC No. MF 9307)," June 14, 2017. ADAMS Accession No. ML17166A038.
3. WCNOC Letter ET 17-0016, "Response to Request for Additional Information Regarding License Amendment Request to Revise Technical Specifications to Transition to Westinghouse Core Design and Safety Analyses," July 13, 2017. ADAMS Accession No. ML17200C939.

Surveillance Requirement Discrepancy

During the review of Wolf Creek Nuclear Operating Corporation (WCNOC) documentation for the Safety Evaluation of the License Amendment Request to Revise Technical Specifications to Transition to Westinghouse Core Design and Safety Analysis Including Adoption of Alternative Source Term, the Nuclear Regulatory Commission (NRC) staff noted a discrepancy between Surveillance Requirements (SR) 3.4.1.3 and SR 3.4.1.4.

In the March 31, 1999, License Amendment (ADAMS Accession No. ML022050061), the values for Reactor Coolant System (RCS) Flow Rate were the same (37.1×10^4 , or 371,000). The only change requested to SRs 3.4.1.3 and 3.4.1.4 in the April 3, 2001, application for amendment (ADAMS Accession No. ML011000205) was to add the words "and greater than or equal to the limit specified in the Core Operating Limits Report (COLR)" to the minimum RCS flow rates.

In Amendment 144 (ADAMS Accession No. ML020930466) the value for SR 3.4.1.3 was shown incorrectly as 3.71×10^4 , while SR 3.4.1.4 showed the correct value of 37.1×10^4 . In spite of this apparent error, when Amendment 144 was incorporated at WCNOC, both SR 3.4.1.3 and SR 3.4.1.4 showed the correct value of 37.1×10^4 when released on site. The Surveillance test that satisfies this requirement (STS RE-011, RCS Total Flow Rate Measurement) has used the Technical Specification (TS) value of 371,000 (37.1×10^4) since License Amendment No. 99 was issued in 1996. The incorrect RCS flow rate value was not incorporated at WCNOC in the TS or used in the Surveillances.

The Enclosure to this Attachment contains a double sided copy of the current Wolf Creek Generating Station TS page for SRs 3.4.1.3 and 3.4.1.4.

It is worth noting, Attachment II of ET 17-0001 (ADAMS Accession Package No. ML17054C103) provides TS mark ups changing the RSC flow rate from $\geq 37.1 \times 10^4$ to $\geq 36.1 \times 10^4$.

**Enclosure to Surveillance Requirement Discrepancy
(2 pages, including coversheet)**

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	<p>B.2</p> <p style="text-align: center;">-----NOTE----- THERMAL POWER does not have to be reduced to comply with this Required Action. -----</p> <p>Perform SR 3.4.1.3.</p>	<p>Prior to THERMAL POWER exceeding 50% RTP</p> <p><u>AND</u></p> <p>Prior to THERMAL POWER exceeding 75% RTP</p> <p><u>AND</u></p> <p>24 hours after THERMAL POWER reaching \geq 95% RTP</p>
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 2.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.1.1 Verify pressurizer pressure is greater than or equal to the limit specified in the COLR.	12 hours

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.1.2	Verify RCS average temperature is less than or equal to the limit specified in the COLR.	12 hours
SR 3.4.1.3	Verify RCS total flow rate is $\geq 37.1 \times 10^4$ gpm and greater than or equal to the limit specified in the COLR.	12 hours
SR 3.4.1.4	<p>-----NOTE-----</p> <p>Not required to be performed until 7 days after $\geq 95\%$ RTP.</p> <p>-----</p> <p>Verify by precision heat balance that RCS total flow rate is $\geq 37.1 \times 10^4$ gpm and greater than or equal to the limit specified in the COLR.</p>	18 months

Enclosure II to ET 18-0004

**CAW-18-4701, Revision 0, "Application for Withholding Proprietary Information from
Public Disclosure," January 19, 2018
(9 pages)**



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USA

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CAW-18-4701

January 19, 2018

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: SAP-18-2 Revision 1, P-Attachment, "Responses to Nuclear Regulatory Commission Request for Additional Information Regarding Wolf Creek Generating Station Transition to Westinghouse Safety Analysis and Alternate Source Term Methodologies"

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 Nuclear Regulatory Commission's ("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 CAW-18-4701 signed by the owner of the proprietary information, Westinghouse. 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 Wolf Creek Nuclear Generating Station.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-18-4701, and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 2 Suite 259, Cranberry Township, Pennsylvania 16066.

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

James A. Gresham, Manager
Regulatory Compliance

AFFIDAVIT

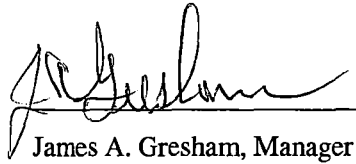
COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

I, James A. Gresham, am authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC ("Westinghouse") and declare that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

Executed on: 1/19/19



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 Nuclear Regulatory Commission’s (“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, 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 SAP-18-2 Revision 1, P-Attachment, "Responses to Nuclear Regulatory Commission Request for Additional Information Regarding Wolf Creek Generating Station Transition to Westinghouse Safety Analysis and Alternate Source Term Methodologies," for submittal to the Commission, being transmitted by Wolf Creek Nuclear Generating Station letter. The proprietary information as submitted by Westinghouse is that associated with Westinghouse Alternate Source Term analysis and Methodology Transition, and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to support Wolf Creek for the Alternate Source Term analysis and Methodology Transition.
 - (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 Alternate Source Term analysis and Methodology Transition.
- (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 a document, 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.

Wolf Creek Nuclear Generation Station

Letter for Transmittal to the NRC

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

Enclosed are:

1. "Responses to Nuclear Regulatory Commission Request for Additional Information Regarding Wolf Creek Generating Station Transition to Westinghouse Safety Analysis and Alternate Source Term Methodologies" (Proprietary)
2. "Responses to Nuclear Regulatory Commission Request for Additional Information Regarding Wolf Creek Generating Station Transition to Westinghouse Safety Analysis and Alternate Source Term Methodologies" (Non-Proprietary)

Also enclosed are the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-18-4701, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice.

As Item 1 contains information proprietary to Westinghouse Electric Company LLC ("Westinghouse"), 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 Nuclear Regulatory Commission ("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-18-4701 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 2, Suite 259, Cranberry Township, Pennsylvania 16066.