

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
L-2018-004 Enclosure 2

Enclosure 2

Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390

(52 Total Pages, including cover sheets)

Enclosure 2 Document List

Attachment 1:

CAW-17-4686, Affidavit for Westinghouse CUFs in SLRA tables
(Enclosure 5 Attachment 1- SLRA Section 4, Attachment 4, & Attachment 5)

Attachment 2:

CAW-17-4675, Affidavit for Westinghouse EAF Calculations
(Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 7)

Attachment 3:

CAW-17-4621, Affidavit for Westinghouse LBB Analysis
(Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 9)

Attachment 4:

EPRI Affidavit for MRP 2017-038
(Enclosure 5 Attachment 1- SLRA Appendix C & Attachment 11)

Attachment 5:

Areva Affidavit for Topical Reports
ANP-3646P Revision 0 (Enclosure 5 Attachment 1 – SLRA Section 4 & Attachment 2)
ANP-3647P Revision 0 (Enclosure 5 Attachment 1 – SLRA Section 4 & Attachment 3)

Attachment 6:

Areva Affidavit for CUFs in SLRA tables
(Enclosure 5 Attachment 1- SLRA Section 4, Attachment 4 & Attachment 5)

Attachment 7:

Areva Affidavit for EAF Calculations
(Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 8)

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PWROG Affidavit for PWROG 17033-P, Revision 0, Update for Subsequent License Renewal:
WCAP-13045, Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of
Westinghouse Type Nuclear Steam Supply Systems dated October 2017
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Attachment 9

Westinghouse Affidavit CAW-17-4683 for withholding
Data Package for Pressurizer Spray and Surge Nozzle Analysis,
(Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 6)

Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(b)(4)

Attachment 1:

Affidavit for withholding for
Westinghouse Letter No. CAW-17-4686 dated December 14, 2017, Affidavit for
Westinghouse CUFs in SLRA tables

(Enclosure 5 Attachment 1- SLRA Section 4, Attachment 4, & Attachment 5)

Applicable Documents:

1. LTR-MRCDA-17-81-P, Rev. 3, "Requested Cumulative Fatigue Usage Factors from Turkey Point Unit 3 and Unit 4 EPU Licensing Report" (Proprietary)
2. LTR-MRCDA-17-81-NP, Rev. 3, "Requested Cumulative Fatigue Usage Factors from Turkey Point Unit 3 and Unit 4 EPU Licensing Report" (Non-proprietary)

Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-17-4686, 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 -17-4686 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.

AFFIDAVIT

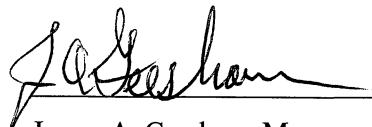
COMMONWEALTH OF PENNSYLVANIA:

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: 12/14/17



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 LTR-MRCDA-17-81-P, Rev. 3, "Requested Cumulative Fatigue Usage Factors from Turkey Point Unit 3 and Unit 4 EPU Licensing Report" (Proprietary), dated December 13, 2017 for submittal to the Commission, being transmitted by Florida Power & Light Company letter. The proprietary information as submitted by Westinghouse is that associated with Westinghouse's request for NRC approval of LTR-MRCDA-17-81-P, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to provide a technical justification for acceptability of environmental assisted fatigue for various components for Turkey Point Units 3 and 4 in support of their subsequent license renewal program.
- (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 supporting other subsequent license renewal programs.
 - (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.

Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(b)(4)

Attachment 2:

Affidavit for withholding for
Westinghouse Letter No. CAW-17-4675 dated December 5, 2017, Affidavit for
Westinghouse EAF Calculations

(Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 7)

Applicable Documents:

1. LTR-SDA-II-17-13-P, Rev. 2, Environmentally Assisted Fatigue Evaluation of the Turkey Point Unit 3 and Unit 4 Pressurizer Upper Head and Shell and Reactor Vessel Core Support Blocks (Westinghouse Proprietary Class 2) (Proprietary)
2. LTR-SDA-II-17-13-NP, Rev. 2, Environmentally Assisted Fatigue Evaluation of the Turkey Point Unit 3 and Unit 4 Pressurizer Upper Head and Shell and Reactor Vessel Core Support Blocks (Non-Proprietary)
3. LTR-CECO-17-025-P, Rev. 1, "Environmentally Assisted Fatigue Evaluation of the Turkey Point Unit 3 and Unit 4 Replacement Steam Generators" (Proprietary)
4. LTR-CECO-17-025-NP, Rev. 1, "Environmentally Assisted Fatigue Evaluation of the Turkey Point Unit 3 and Unit 4 Replacement Steam Generators" (Non-Proprietary)

Also enclosed are the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-17-4675, 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-17-4675 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 259, Cranberry Township, Pennsylvania 16066.

AFFIDAVIT

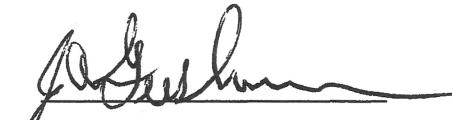
COMMONWEALTH OF PENNSYLVANIA:

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: 12/5/17



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.
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- (a) This information is part of that which will enable Westinghouse to provide a technical justification for acceptability of environmental assisted fatigue for various components for Turkey Point Units 3 and 4 in support of their subsequent license renewal program.
- (b) Further, this information has substantial commercial value as follows:
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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.

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Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(b)(4)

Attachment 3:

Affidavit for withholding for
Westinghouse Letter No. CAW-17-4621, dated August 31. 2017, Affidavit for
Westinghouse LBB Analysis

(Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 9)

Applicable Documents:

1. WCAP-15354-P, Revision 1, Technical Justification for Eliminating Large Primary Loop Pipe Rupture as the Structural Design Basis for Turkey Point Units 3 and 4 Nuclear Power Plants for the Subsequent License Renewal Time-Limited Aging Analysis Program (80 Years) Leak-Before-Break Evaluation (Proprietary)
2. WCAP-15354-NP, Revision 1, Technical Justification for Eliminating Large Primary Loop Pipe Rupture as the Structural Design Basis for Turkey Point Units 3 and 4 Nuclear Power Plants for the Subsequent License Renewal Time-Limited Aging Analysis Program (80 Years) Leak-Before-Break Evaluation (Non-Proprietary)

Also enclosed are the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-17-4621 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.

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AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

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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:

8/31/17


James A. Gresham
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.
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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:

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Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

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- (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.
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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, 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 WCAP-15354-P, Revision 1, "Technical Justification for Eliminating Large Primary Loop Pipe Rupture as the Structural Design Basis for Turkey Point Units 3 and 4 Nuclear Power Plants for the Subsequent License Renewal Time-Limited Aging Analysis Program (80 Years) Leak-Before-Break Evaluation" (Proprietary), dated August 2017, for submittal to the Commission, being transmitted by Florida Power & Light Company letter. The proprietary information as submitted by Westinghouse is that associated with Westinghouse's request for NRC approval of WCAP-15354, and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to provide a technical justification for eliminating large primary loop pipe rupture as the structural design basis for Turkey Point Units 3 and 4 Nuclear Power Plants for

the Subsequent License Renewal Time-Limited Aging Analysis Program (80 Years).

- (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 performing evaluation of technical justification for eliminating large primary loop pipe rupture as the structural design basis for the Subsequent License Renewal Time-Limited Aging Analysis Program (80 Years) for Nuclear Power Plants.
 - (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.

Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(a)(4)

Attachment 4:

Affidavit for withholding for

EPRI letter dated December 14, 2017, Affidavit for MRP 2017-03

(Enclosure 5 Attachment 1- SLRA Appendix C & Attachment 11)

1. Materials Reliability Program Letter MRP 2017-038 to MRP members, entitled, Transmittal of Preliminary Results from MRP-191 Expert Panel Review in Support of Subsequent License Renewal at U.S. PWR Plants.

This is a request under 10 C.F.R. §2.390(a)(4) that the U.S. Nuclear Regulatory Commission (NRC) withhold from public disclosure the information identified in the enclosed Affidavit consisting of the commercial information owned by Electric Power Research Institute, Inc. (EPRI) identified above (the "Report"). Copies of the Report and the Affidavit in support of this request are enclosed.

EPRI desires to disclose these preliminary results in confidence to supplement previously submitted information as requested by the NRC in a letter dated 9/6/2017 [Ref. ML 17220A008]. The preliminary results reported herein are not to be divulged to anyone outside of the NRC nor shall any copies be made of the information provided herein. EPRI welcomes any discussions and/or questions relating to the information enclosed.

If you have any questions about the legal aspects of this request for withholding, please do not hesitate to contact Steven Swilley at (704) 595-2630. Questions on the content of the Report should be directed to Kyle Amberge of EPRI at (704) 595-2039.



AFFIDAVIT

RE: Request for Withholding of the Following Commercial Document:

Materials Reliability Program Letter MRP 2017-038 to MRP members, entitled
"Transmittal of Preliminary Results from MRP-191 Expert Panel Review in
Support of Subsequent License Renewal at U.S. PWR Plants"

I, Steven Swilley, being duly sworn, depose and state as follows:

I am the Senior Director and Deputy Chief Nuclear Officer at Electric Power Research Institute, Inc. whose principal office is located at 3420 Hillview Avenue, Palo Alto, California ("EPRI") and I have been specifically delegated responsibility for the above-listed Report that is sought under this Affidavit to be withheld (the "Report"). I am authorized to apply to the U.S. Nuclear Regulatory Commission ("NRC") for the withholding of the Report on behalf of EPRI.

EPRI requests that the Report be withheld from the public on the following bases:

Withholding Based Upon Privileged And Confidential Trade Secrets Or Commercial Or Financial Information (see e.g. 10 C.F.R. §2.390(a)(4)):

a. The Report is owned by EPRI and constitutes commercial information which has not been placed in the public domain by EPRI.

b. EPRI made a substantial economic investment to develop the Report and, by prohibiting public disclosure, EPRI derives an economic benefit in the form of fees charged for the sale of the Report. The Report is entitled to the protection of the United States copyright laws. If the Report was publicly available to consultants and/or other businesses providing services in the electric and/or nuclear power industry at no cost, these entities would be able to use the Report for their own commercial benefit and profit and without expending the substantial economic resources required of EPRI to develop the Report.

c. EPRI made a substantial investment of both money and employee hours over an extended period of time in the development of the Report. As a result of such effort and cost, both in terms of dollars spent and dedicated employee time, the Report is highly valuable to EPRI.

d. A public disclosure of the Report would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to sell the Report both domestically and internationally. If a party does not purchase the Report from EPRI, it would require an investment of money, time and effort equivalent to that expended by EPRI for the party to duplicate the Report.

I have read the foregoing and the matters stated herein are true and correct to the best of my knowledge, information and belief. I make this affidavit under penalty of perjury under the laws of the United States of America and under the laws of the State of California.

Executed at 1300 W WT Harris Blvd, Charlotte, NC being the premises and place of business of Electric Power Research Institute, Inc.

Date: Dec 14, 2017
Kr S.

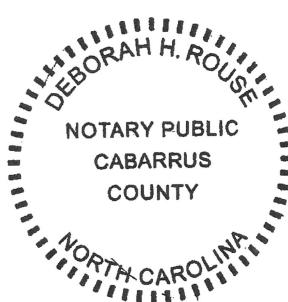
Steven Swilley

(State of North Carolina)
(County of Mecklenburg)

Subscribed and sworn to (or affirmed) before me on this 14th day of December, 2017, by
Steven Swilley, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Deborah H. Rouse (Seal)

My Commission Expires 2nd day of April, 2021



Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(a)(4)

Attachment 5:

Areva Affidavit for Topical Reports

ANP-3646P Revision 0

(Enclosure 5 Attachment 1 –SLRA Section 4 & Attachment 2)

ANP-3647P Revision 0

(Enclosure 5 Attachment 1 –SLRA Section 4 & Attachment 3)

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

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

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

3. I am familiar with the Framatome Inc. information contained in the following documents:

- i) Topical Report ANP-3646P Revision 0 (Framatome Inc. document 43-3646P-000), "Low Upper-Shelf Toughness Fracture Mechanics Analysis of Turkey Point Units 3 and 4 Reactor Vessels for Levels A & B Service Loads at 80-Years," and,
- ii) Topical Report ANP-3647P Revision 0 (Framatome Inc. document 43-3647P-000), "Low Upper-Shelf Toughness Fracture Mechanics Analysis of Turkey Point Units 3 and 4 Reactor Vessels for Levels C & D Service Loads at 80-Years,"

referred to herein as "Documents." Information contained in these Documents has been classified by Framatome Inc. as proprietary in accordance with the policies established by Framatome Inc. for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by Framatome Inc. and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents 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 Framatome Inc. to determine whether information should be classified as proprietary:

- (a) The information reveals details of Framatome Inc.'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 Framatome Inc.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome Inc. in product optimization or marketability.

(e) The information is vital to a competitive advantage held by Framatome Inc., would be helpful to competitors to Framatome Inc., and would likely cause substantial harm to the competitive position of Framatome Inc.

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

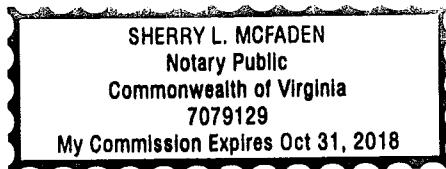
7. In accordance with Framatome Inc.'s policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside Framatome Inc. only as required and under suitable agreement providing for nondisclosure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

8. Framatome Inc.'s 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.

SUBSCRIBED before me this 5th
day of January, 2018.

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



Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(a)(4)

Attachment 6:

Affidavit dated December 15, 2017 for withholding for
Areva CUFs in SLRA tables

(Enclosure 5 Attachment 1- SLRA Section 4, Attachment 4 & Attachment 5)

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle Elliott. I am Deputy Director, Licensing & Regulatory Affairs, 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 Table 4.3-1, "Turkey Point Unit 3 and Unit 4 Cumulative Fatigue Usages Factors for Reactor Coolant System Components and Component Supports," and Table 4.3.3-1, "80 Year Environmentally Assisted Fatigue CUFs NUREG/CR-6260 and Plant Specific Reactor Coolant Pressure Boundary Locations," of Section 4, "Time-Limited Aging Analyses," of Turkey Point Units 3 and 4 Subsequent License Renewal Application and 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 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:

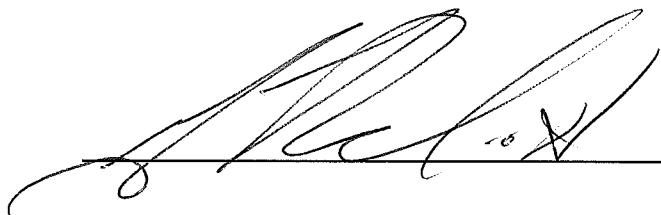
- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (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(d) and 6(e) 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.

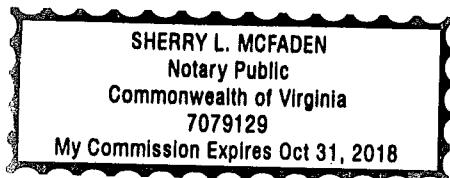
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.



SUBSCRIBED before me this 15th
day of December, 2017.



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



Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(a)(4)

Attachment 7:

Affidavit dated December 15, 2017, for withholding
Areva EAF Calculations

(Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 8)

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle Elliott. I am Deputy Director, Licensing & Regulatory Affairs, 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 Calculation Summary Sheets 32-9279161-001, "Turkey Point SLR EAF Analysis for Reactor Vessel Flange," 32-9279174-001, "Turkey Point – 3 & 4 CRDM Nozzle to Adapter Weld Connection EAF Evaluation," 32-9279212-001, "Turkey Point 3 & 4 Replacement RVCH CRDM Nozzle EAF Analysis," 32-9279362-001, "TP Vent Nozzle Environmentally Assisted Fatigue," 32-9279367-001, "TP CRDM Latch Housing Environmentally Assisted Fatigue," and 32-9280202-001, "TP CRDM Lower Joint Environmentally Assisted Fatigue," all dated December 2017 and referred to herein as "Documents." Information contained in these Documents has been classified by AREVA as proprietary in accordance with the policies established by AREVA for the control and protection of proprietary and confidential information.

4. These Documents contain 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 these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents 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 these Documents is considered proprietary for the reasons set forth in paragraphs 6(d) and 6(e) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in these Documents 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.

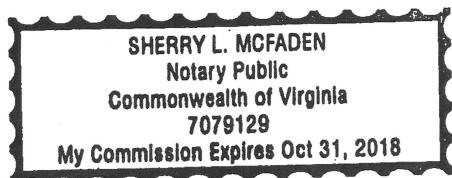
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.



SUBSCRIBED before me this 15th
day of December, 2017.



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



Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(b)(4)

Attachment 8:

Affidavit for withholding for

PWROG 17033-P, Revision 0, Update for Subsequent License Renewal: WCAP-13045,
Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of
Westinghouse Type Nuclear Steam Supply Systems dated October 2017

(Enclosure 5 Attachment 10)

Applicable Documents:

1. PWROG-17033-P, Revision 0, "Update for Subsequent License Renewal: WCAP-13045, 'Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems' " (Proprietary)
2. PWROG-17033-NP, Revision 0, "Update for Subsequent License Renewal: WCAP-13045, 'Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems' " (Non-Proprietary)

Also enclosed are the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-17-4674 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 item listed above or the supporting Westinghouse Affidavit should reference CAW-17-4674 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 256, Cranberry Township, Pennsylvania 16066.

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss.

COUNTY OF BUTLER:

I, Edmond J. Mercier, 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: 12/4/2017



Edmond J. Mercier, Manager
Product and Plant Licensing

- (1) I am Manager, Product and Plant Licensing, 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 PWROG-17033-P, Revision 0, "Update for Subsequent License Renewal: WCAP-13045, 'Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems'" (Proprietary), dated October 2017, for submittal to the Commission, being transmitted by PWROG letter OG-17-293. The proprietary information as submitted by Westinghouse is that associated with reactor coolant loop pump casing fracture mechanics integrity evaluations for the subsequent license renewal program (80 years of service) and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to perform reactor coolant loop pump casing fracture mechanics integrity evaluations for the subsequent license renewal program (80 years of service).

- (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 performing reactor coolant loop pump casing fracture mechanics integrity evaluations for the subsequent license renewal program (80 years of service).
 - (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 the 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 report transmitted herewith bears a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in this report which is 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. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(b)(4)

Attachment 9

Affidavit for withholding Westinghouse
Data Package for Pressurizer Spray and Surge Nozzle Analysis, CAW-17-4683

(Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 6)

Applicable Documents:

1. LTR-SGMP-11-66-P, Revision 3, Turkey Point Units 3 and 4 Data Package for Pressurizer Spray and Surge Nozzle Analysis (Proprietary)
2. L TR-SGMP-11-66-NP, Revision 3, Turkey Point Units 3 and 4 Data Package for Pressurizer Spray and Surge Nozzle Analysis (Non-Proprietary)

Also enclosed are the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-17-4683 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-17-4683 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 2 Suite 256, Cranberry Township, Pennsylvania 16066.

AFFIDAVIT

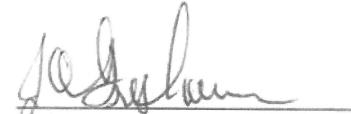
COMMONWEALTH OF PENNSYLVANIA:

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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: 12/13/17



James A. Gresham
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 LTR-SGMP-11-66-P, Revision 3, "Turkey Point Units 3 and 4 Data Package for Pressurizer Spray and Surge Nozzle Analysis" (Proprietary), dated December 2017 for submittal to the Commission, being transmitted by Florida Power & Light Company letter. The proprietary information as submitted by Westinghouse is that associated with Westinghouse's request for NRC approval of LTR-SGMP-11-66-P and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to provide a response to a request from Florida Power & Light Company for the relevant data to support the analysis of pressurizer spray nozzle and surge nozzle in the Turkey Point Units 3 and 4. It provides geometric and material property data

related to these nozzles and other structures in their vicinity and the design loads on the nozzles.

- (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 supporting other subsequent license renewal programs.
 - (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).

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