



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 3, 2018

Mr. Mano Nazar  
President, Nuclear Division, and  
Chief Nuclear Officer  
Florida Power & Light Company  
Mail Stop: EX/JB  
700 Universe Blvd.  
Juno Beach, FL 33408

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE  
(EPID NO. L-2018-RNW-0002)

Dear Mr. Nazar:

By letters dated January 30, 2018, (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML18037A812), February 9, 2018 (ADAMS Accession No. ML18044A653), February 16, 2018 (ADAMS Package Accession No. ML18053A123), and March 1, 2018 (ADAMS Package Accession No. ML18072A224), Florida Power & Light Company (FPL) submitted and supplemented an application for subsequent license renewal of Renewed Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Generating Unit Nos. 3 and 4. As part of this application, FPL submitted several affidavits regarding specific information. Specifically, the affidavits from the following organizations were submitted by FPL:

1. On behalf of Westinghouse Electric Company LLC (Enclosure 1)
2. On behalf of Electric Power Research Institute, Inc. (Enclosure 2)
3. On behalf of Framatome Inc. (formerly AREVA, Inc.) (Enclosure 3)

Enclosure 4 contains a table listing all of the affidavits and the letters submitting each affidavit.

During the proprietary review, the U.S. Nuclear Regulatory Commission (NRC) staff identified inconsistencies among the affidavits, the non-proprietary version of the application, and the proprietary version of the application, which required FPL to submit a supplement, dated February 9, 2018. The NRC staff also identified inconsistencies within the non-proprietary version of the application regarding what information was identified as proprietary and what was not. In following up on the staff's questions, FPL also identified incorrectly marked proprietary information. As a result, FPL submitted a second supplement to the application, dated February 16, 2018. Finally, the NRC staff asked questions about why information was being withheld because the staff believed the application contained sufficient information to calculate the information which was being withheld. As a result, FPL submitted a third supplement to the application, dated March 1, 2018.

We have reviewed your application, supplements, and material in accordance with the requirements of Title 10 of the *Code of Federal Regulation* (10 CFR) Section 2.390 and, on the

basis of the statements in the affidavits, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, Enclosures 3 and 5 of the Subsequent License Renewal Application (SLRA), dated January 30, 2018; Attachment 2 of Supplement 1 to the SLRA, dated February 8, 2018; Attachment 3 of Supplement 2 to the SLRA, dated February 16, 2018; and Attachment 3 and proprietary marked portion of Attachment 4 of Supplement 3 to the SLRA, dated March 1, 2018, will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the U.S. Nuclear Regulatory Commission (NRC). You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, please contact the project manager, Lois M. James at 301-415-3306 or e-mail [Lois.James@nrc.gov](mailto:Lois.James@nrc.gov).

Sincerely,

**/RA/**

Eric Oesterle, Chief  
License Renewal Projects Branch  
Division of Materials and License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosures: As stated

cc: Listserv

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE  
(EPID NOS. L-2018-RNW-0002)

**DISTRIBUTION:**

**E-MAIL:**

PUBLIC

- RidsNrrDmlr Resource
- RidsNrrDmlrMrpb Resource
- RidsNrrDmlrMenb Resource
- RidsNrrDmlrMphb Resource
- RidsNrrDmlrMccb Resource
- RidsNrrDmlrMvib Resource
- RidsNrrPMTurkeyPoint Resource

- 
- [Yvonne.Edmonds@nrc.gov](mailto:Yvonne.Edmonds@nrc.gov); NRR/DMLR
  - [Lois.James@nrc.gov](mailto:Lois.James@nrc.gov); NRR/DMLR
  - [Eric.Oesterle@nrc.gov](mailto:Eric.Oesterle@nrc.gov); NRR/DMLR
  - [Benjamin.Beasley@nrc.gov](mailto:Benjamin.Beasley@nrc.gov); NRR/DMLR
  - [George.Wilson@nrc.gov](mailto:George.Wilson@nrc.gov); NRR/DMLR
  - [Joseph.Donoghue@nrc.gov](mailto:Joseph.Donoghue@nrc.gov); NRR/DMLR
  - [Michael.Wentzel@nrc.gov](mailto:Michael.Wentzel@nrc.gov); NRR/DORL
  - [Sherwin.Turk@nrc.gov](mailto:Sherwin.Turk@nrc.gov); OGC
  - [Catherine.Scott@nrc.gov](mailto:Catherine.Scott@nrc.gov); OGC
  - [Scott.Burnell@nrc.gov](mailto:Scott.Burnell@nrc.gov); HQ/OPA
  - [Roger.Hannah@nrc.gov](mailto:Roger.Hannah@nrc.gov); RII/OPA
  - [Joey.Ledford@nrc.gov](mailto:Joey.Ledford@nrc.gov); RII/OPA
  - [David.Decker@nrc.gov](mailto:David.Decker@nrc.gov); OCA
  - [John.Pelchat@nrc.gov](mailto:John.Pelchat@nrc.gov); RII/ORA
  - [LaDonna.Suggs@nrc.gov](mailto:LaDonna.Suggs@nrc.gov); RII/DRP
  - [Lundy.Pressley@nrc.gov](mailto:Lundy.Pressley@nrc.gov); RII/DRP
  - [Dan.Orr@nrc.gov](mailto:Dan.Orr@nrc.gov); RII/DRP
  - [Nicholas.Hobbs@nrc.gov](mailto:Nicholas.Hobbs@nrc.gov); RII/DRP
  - [Tara.Inverso@nrc.gov](mailto:Tara.Inverso@nrc.gov); OEDO
  - [Edwin.Lea@nrc.gov](mailto:Edwin.Lea@nrc.gov); RII/ORA
  - [Jeremy.Bowen@nrc.gov](mailto:Jeremy.Bowen@nrc.gov); OEDO
  - [William.Burton@nrc.gov](mailto:William.Burton@nrc.gov); NRR/DMLR
  - [Paula.Cooper@nrc.gov](mailto:Paula.Cooper@nrc.gov); RII/DRS

- [Steve.Franzone@fpl.com](mailto:Steve.Franzone@fpl.com);
- [William.Maher@fpl.com](mailto:William.Maher@fpl.com)

James A. Gresham  
Manager Regulatory Compliance

Westinghouse Electric Company  
1000 Westinghouse Drive,  
Building 2 Suite 259  
Cranberry Township, PA 16066

Steven Swilley,  
Sr Director/Deputy Chief Nuclear Officer  
Electric Power Research Institute, Inc.  
1300 W WT Harris Blvd  
Charlotte, NC 28262

Gayle Elliott, Deputy Director  
Licensing & Regulatory Affairs  
AREVA Inc.  
3315 Old Forest Road  
Lynchburg, VA 24501

Edmond J. Mercier, Manager  
Product and Plant Licensing  
Westinghouse Electric Company LLC  
1000 Westinghouse Drive  
Cranberry Township PA 16066

Phillip A. Opsal, Manager  
Product Licensing  
Framatome  
3315 Old Forest Road  
Lynchburg, Virginia 24501

ADAMS Accession Nos.: ML18038A691 \*Concurrence via email

OFFICE	PM:MRPB:DMLR	LA:MRPB:DMLR	BC:MVIB:DMLR	BC:MPHB:DMLR
NAME	LJames*	YEdmonds	SRuffin (A)*	DAiley*
DATE	3/ 28 /2018	3/ 28 /2018	04/03/2018	02/13/2018
OFFICE	BC:MRPB:DMLR			
NAME	EOesterle			
DATE	4/ 3 /2018			

**OFFICIAL RECORD**

**REVIEW OF AFFIDAVITS SUBMITTED BY FLORIDA POWER & LIGHT COMPANY (FPL)  
ON BEHALF OF WESTINGHOUSE ELECTRIC COMPANY LLC (WESTINGHOUSE)  
REQUESTING SEVERAL DOCUMENTS BE WITHHELD FROM PUBLIC DISCLOSURE**

- Affidavit dated December 14, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18037A829)), executed by James A. Gresham of Westinghouse Electric Company LLC (Westinghouse) requesting that the information contained in the following document be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:
  - LTR-MRCDA-17-81-P, Rev. 3, "Requested Cumulative Fatigue Usage Factors from Turkey Point Unit 3 and Unit 4 EPU Licensing Report" (Proprietary)

The Westinghouse proprietary information referenced in this affidavit was used in Structural Integrity Associates, Inc. (SIA) Report No. 1700109.402P, Revision 3, "Evaluation of Fatigue of ASME Section III, Class 1 Components for Turkey Point Units 3 and 4 for Subsequent License Renewal," December 2017. A non-proprietary version of SIA Report No. 1700109.402, Revision 3, can be found in Enclosure 4, "Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents," (ADAMS Accession Nos. ML18037A837 and ML18044A653).

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- Westinghouse plans to sell the use of similar information to its customers for the purpose of supporting other subsequent license renewal programs.
  - Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
  - 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.
- Affidavit dated December 5, 2017 (ADAMS Accession No. ML18037A829), executed by James A. Gresham of Westinghouse requesting that the information contained in the following document be withheld from public disclosure pursuant to 10 CFR Section 2.390:
    - 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)
    - LTR-CECO-17-025-P, Rev. 1, "Environmentally Assisted Fatigue Evaluation of the Turkey Point Unit 3 and Unit 4 Replacement Steam Generators" (Proprietary)

The Westinghouse proprietary information referenced in this affidavit was used in SIA Report No. 1700109.402P, Revision 3, "Evaluation of Fatigue of ASME Section III, Class 1 Components for Turkey Point Units 3 and 4 for Subsequent License Renewal," December 2017, and in SIA Report No. 1700109.401P, Revision 3, "Evaluation of

Environmentally-Assisted Fatigue for Turkey Point Units 3 and 4 for Subsequent License Renewal,” January 2018. Non-proprietary versions of these SIA Reports can be found in Enclosure 4, “Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents,” can be found in Enclosure 4, “Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents,” (ADAMS Accession Nos. ML18037A837 and ML18044A653).

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- Westinghouse plans to sell the use of similar information to its customers for the purpose of supporting other subsequent license renewal programs.
  - Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
  - 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.
- Affidavit dated August 31, 2017 (ADAMS Accession No. ML18037A829), executed by James A. Gresham of Westinghouse requesting that the information contained in the following document be withheld from public disclosure pursuant to 10 CFR Section 2.390:
    - 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)

A non-proprietary version of this document can be found in Enclosure 4, “Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents,” (ADAMS Accession Nos. ML18037A837 and ML18044A653).

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- Westinghouse plans to sell the use of similar information to its customers for the purpose of supporting other subsequent license renewal programs.
- Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
- 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.

- Affidavit dated December 13, 2017 (ADAMS Accession No. ML18037A829), executed by James A. Gresham of Westinghouse requesting that the information contained in the following document be withheld from public disclosure pursuant to 10 CFR Section 2.390:
  - LTR-SGMP-11-66-P, Revision 3, Turkey Point Units 3 and 4 Data Package for Pressurizer Spray and Surge Nozzle Analysis (Proprietary)

A non-proprietary version of this document can be found in Enclosure 4, "Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents," (ADAMS Accession Nos. ML18037A837 and ML18044A653).

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- Westinghouse plans to sell the use of similar information to its customers for the purpose of supporting other subsequent license renewal programs.
  - Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
  - 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.
- Affidavit dated December 4, 2017 (ADAMS Accession No. ML18037A829), executed by Edmond J. Mercier of Westinghouse requesting that the information contained in the following document be withheld from public disclosure pursuant to 10 CFR Section 2.390:
    - 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)

A non-proprietary version of this document can be found in Enclosure 4, "Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents," (ADAMS Accession Nos. ML18037A837 and ML18044A653).

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- Westinghouse plans to sell the use of similar information to its customers for the purpose of supporting other subsequent license renewal programs.
- Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
- 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.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

**REVIEW OF AFFIDAVITS SUBMITTED BY FLORIDA POWER & LIGHT COMPANY (FPL)  
ON BEHALF OF ELECTRIC POWER RESEARCH INSTITUTE, INC. (EPRI) A DOCUMENT  
BE WITHHELD FROM PUBLIC DISCLOSURE**

- Affidavit dated December 14, 2017 (ADAMS Accession No. ML18037A829), executed by Steven Swilley of EPRI requesting that the information contained in the following document be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:
  - 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.

A non-proprietary version of the document would be of no value to the public due to the extent of the proprietary information, therefore there is no non-proprietary version available.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

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

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.



**REVIEW OF AFFIDAVITS SUBMITTED BY FLORIDA POWER & LIGHT COMPANY (FPL)  
ON BEHALF OF FRAMATOME INC. (FORMERLY AREVA) (FRAMATOME) REQUESTING  
SEVERAL DOCUMENTS BE WITHHELD FROM PUBLIC DISCLOSURE**

- Affidavit dated January 5, 2018 (ADAMS Accession No. ML18037A829), executed by Phillip A. Opsal of Framatome requesting that the information contained in the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:
  - Topical Report ANP-3646P Revision 0 (Framatome Inc. document 43-3646P-000), “Low Upper-Shelf Toughness Fracture Mechanics Analysis Turkey Point Units 3 and 4 Reactor Vessels for Levels A & B Service Loads at 80-Years”
  - Topical Report ANP-3647P Revision 0 (Framatome In. document 43-3647P-000), “Lower Upper-Shelf Toughness Fracture Mechanics Analysis of Turkey Point Units 3 and 4 Reactor Vessels for Levels C & D Service Loads at 80-Years”

Non-proprietary versions of these documents can be found in Enclosure 4, “Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents,” (ADAMS Accession Nos. ML18037A837 and ML18044A653).

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- The information reveals details of Framatome Inc.’s research and development plans and programs or their results.
  - Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time and resources, to design, produce or market a similar product or service.
  - 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.
  - 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.
- Affidavit dated February 26, 2018 (ADAMS Accession No. ML18072A230), executed by Philip A. Opsal, Manager Product Licensing, Framatome, requesting that the information contained in the following document be withheld from public disclosure pursuant to 10 CFR, Part 2, Section 2.390:
    - Table 4.2.2-1, "RTPTS Calculations for Turkey Point Unit 3 Extended Beltline Materials at 72 EFPY,"
    - Table 4.2.2-2, "RTPTS Calculations for Turkey Point Unit 4 Extended Beltline Materials at 72 EFPY,"
    - Table 4.2.3-1, "Turkey Point Unit 3 Predicted Position 1.2 USE Values at 72 EFPY,"
    - Table 4.2.3-2, "Turkey Point Unit 4 Predicted Position 1.2 USE Values at 72 EFPY,"
    - Table 4.2.4-1, "Turkey Point Unit 3 ART Calculations for 72 EFPY,"
    - Table 4.2.4-2, "Turkey Point Unit 4 ART Calculations for 72 EFPY,"
    - Page 4.2-6 of Section 4

- Table 4.3-1, "PTN [Turkey Point Nuclear Generating] Unit 3 and Unit 4 60-Year Fatigue Cumulative Usage Factors for Reactor Coolant System Components,"
- Table 4.3.3-2, "80-Year Environmentally Assisted Fatigue CUFs," and
- Pages 4.3-22, 4.3-23 and 4.3-24 of Section 4, "Time-Limited Aging Analyses."

A non-proprietary version of this information can be found in the letter (Enclosure 4 of this letter, ADAMS Accession No. ML18072A232).

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- The information reveals details of AREVA's research and development plans and programs or their results.
  - 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.
  - 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.
  - 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.
  - 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.
- Affidavit dated December 15, 2017 (ADAMS Accession No. ML18037A829), executed by Gayle Elliott, Deputy Director, Licensing & Regulatory Affairs, for AREVA, requesting that the information contained in the following document be withheld from public disclosure pursuant to 10 CFR, Part 2, Section 2.390:
    - Calculation Summary Sheet 32-9279161-001, "Turkey Point SLR EAF Analysis for Reactor Vessel Flange" dated December 2017,
    - Calculation Summary Sheet 32-9279174-001, "Turkey Point- 3 & 4 CRDM Nozzle to Adapter Weld Connection EAF Evaluation" dated December 2017,
    - Calculation Summary Sheet 32-9279212-001, "Turkey Point 3 & 4 Replacement RVCH CRDM Nozzle EAF Analysis," dated December 2017,
    - Calculation Summary Sheet 32-9279362-001, "TP Vent Nozzle Environmentally Assisted Fatigue" dated December 2017,
    - Calculation Summary Sheet 32-9279367-001, "TP CRDM Latch Housing Environmentally Assisted Fatigue" dated December 2017, and
    - Calculation Summary Sheet 32-9280202-001, "TP CRDM Lower Joint Environmentally Assisted Fatigue," dated December 2017.

Non-proprietary versions of these documents can be found in Enclosure 4, "Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents," (ADAMS Accession Nos. ML18037A837 and ML18044A653).

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- The information reveals details of AREVA's research and development plans and programs or their results.
- 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.
- 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.
- 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.
- 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.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

**APPLICATIONS FOR WITHHOLDING PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE  
PURSUANT TO 10 CFR 2.390**

Coversheet Document Name	CAW-17-4686, Affidavit for Westinghouse Cumulative Usage Fatigue (CUFs) in SLRA tables (Enclosure 5 Attachment 1 - SLRA Section 4, Attachment 4 & Attachment 5)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
Affidavit Document Name	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	N/A	N/A	N/A
Enclosure	2	N/A	N/A	N/A
Attachment	1	N/A	N/A	N/A
Date	12/14/2017	N/A	N/A	N/A

Coversheet Document Name	CAW-17-4675, Affidavit for Westinghouse Environmentally Assisted Fatigue (EAF) Calculations (Enclosure 5 Attachment 1 - SLRA Section 4 & Attachment 7)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
	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), dated November 30, 2017	N/A	N/A	N/A
Affidavit Document Name	LTR-CECO-17-025-P, Rev. 1, "Environmentally Assisted Fatigue Evaluation of the Turkey Point Unit 3 and Unit 4 Replacement Steam Generators" (Proprietary), dated November 30, 2017	N/A	N/A	N/A
Enclosure	2	N/A	N/A	N/A
Attachment	2	N/A	N/A	N/A
Date	12/05/2017	N/A	N/A	N/A

Coversheet Document Name	CAW-17-4621, Affidavit for Westinghouse Leak-Before-Break (LBB) Analysis (Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 9)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
Affidavit Document Name	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	N/A	N/A	
Enclosure	2	N/A	N/A	N/A
Attachment	3	N/A	N/A	N/A
Date	08/31/2017	N/A	N/A	N/A

Coversheet Document Name	EPRI Affidavit for Materials Reliability Program (MRP) 2017-038 (Enclosure 5 Attachment 1 - SLRA Appendix C & Attachment 11)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
Affidavit Document Name	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"	N/A	N/A	N/A
Enclosure	2	N/A	N/A	N/A
Attachment	4	N/A	N/A	N/A
Date	12/14/2017	N/A	N/A	N/A

Coversheet Document Name	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)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
Affidavit Document Name	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"	N/A	N/A	N/A
	Topical Report ANP-3647P revision 0 (Framatome Inc., document 43-3467P-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"	N/A	N/A	N/A
Enclosure	2	N/A	N/A	N/A
Attachment	5	N/A	N/A	N/A
Date	01/05/2018	N/A	N/A	N/A



Coversheet Document Name	Areva Affidavit for CUFs in SLRA tables (Enclosure 5 Attachment 1- SLRA Section 4, Attachment 4 & Attachment 5)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
Affidavit Document Name	Not in affidavit	Not in affidavit	Table 4.2.2-1, "RTPTS Calculations for Turkey Point Unit 3 Extended Beltline Materials at 72 EFPY"	Table 4.2.2-1, "RTPTS Calculations for Turkey Point Unit 3 Extended Beltline Materials at 72 EFPY"
	Not in affidavit	Not in affidavit	Table 4.2.2-2, "RTPTS Calculations for Turkey Point Unit 4 Extended Beltline Materials at 72 EFPY"	Table 4.2.2-2, "RTPTS Calculations for Turkey Point Unit 4 Extended Beltline Materials at 72 EFPY"
	Not in affidavit	Not in affidavit	Table 4.2.3-1, "Turkey Point Unit 3 Predicted Position 1.2 USE Values at 72 EFPY"	Table 4.2.3-1, "Turkey Point Unit 3 Predicted Position 1.2 USE Values at 72 EFPY"
	Not in affidavit	Not in affidavit	Table 4.2.3-2, "Turkey Point Unit 4 Predicted Position 1.2 USE Values at 72 EFPY"	Table 4.2.3-2, "Turkey Point Unit 4 Predicted Position 1.2 USE Values at 72 EFPY"
	Not in affidavit	Not in affidavit	Table 4.2.4-1, "Turkey Point Unit 3 ART Calculations for 72 EFPY"	Table 4.2.4-1, "Turkey Point Unit 3 ART Calculations for 72 EFPY"
	Not in affidavit	Not in affidavit	Table 4.2.4-2, "Turkey Point Unit 4 ART Calculations for 72 EFPY"	Table 4.2.4-2, "Turkey Point Unit 4 ART Calculations for 72 EFPY"
	Not in affidavit	Not in affidavit	Not in affidavit	Page 4.2-6 of Section 4, "Reactor Vessel Neutron Embrittlement Analysis"
	Table 4.3-1, "Turkey Point Unit 3 and Unit 4 Cumulative Fatigue Usages Factors for Reactor Coolant System Components and Component Supports"	Table 4.3-1, "PTN Unit 3 and Unit 4 60-Year Fatigue Cumulative Usage Factors for Reactor Coolant System Components"	Table 4.3-1, "PTN Unit 3 and Unit 4 60-Year Fatigue Cumulative Usage Factors for Reactor Coolant System Components"	Table 4.3-1, "PTN Unit 3 and Unit 4 60-Year Fatigue Cumulative Usage Factors for Reactor Coolant System Components"

Coversheet Document Name	Areva Affidavit for CUFs in SLRA tables (Enclosure 5 Attachment 1- SLRA Section 4, Attachment 4 & Attachment 5) (Continued)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
	Table 4.3.3-1, "80 Year Environmentally Assisted Fatigue CUFs NUREG/CR-6260 and Plant Specific Reactor Coolant Pressure Boundary Locations"	Removed from affidavit	Not in affidavit	Not in affidavit
	Not in affidavit	Table 4.3.3-2, "80-Year Environmentally Assisted Fatigue CUFs"	Table 4.3.3-2, "80-Year Environmentally Assisted Fatigue CUFs"	Table 4.3.3-2, "80-Year Environmentally Assisted Fatigue CUFs"
	Not in affidavit	Pages 4.3 - 22 and 4.3-23 of Section 4, "Time-Limited Aging Analyses"	Pages 4.3-22 and 4.3-23 of Section 4, "Time-Limited Aging Analyses"	Pages 4.3-22 and 4.3-23 of Section 4, "Time-Limited Aging Analyses"
	Not in affidavit	Not in affidavit	Page 4.3-24 of Section 4, "Time-Limited Aging Analyses"	Page 4.3-24 of Section 4, "Time-Limited Aging Analyses"
Enclosure	2	N/A	N/A	N/A
Attachment	6	N/A	N/A	N/A
Date	12/15/2017	02/08/2018	02/15/2018	02/26/2018

Coversheet Document Name	Areva EAF Calculations (Enclosure 5 Attachment 1- SLRA Section 4 & Attachment 8)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
Affidavit Document Name	Calculation Summary Sheet 32-9279161-001, "Turkey Point SLR EAF Analysis for Reactor Vessel Flange" dated December 2017	N/A	N/A	N/A
	Calculation Summary Sheet 32-9279174-001, "Turkey Point- 3 & 4 CRDM Nozzle to Adapter Weld Connection EAF Evaluation" dated December 2017	N/A	N/A	N/A
	Calculation Summary Sheet 32-9279212-001, "Turkey Point 3 & 4 Replacement RVCH CRDM Nozzle EAF Analysis" dated December 2017	N/A	N/A	N/A
	Calculation Summary Sheet 32-9279362-001, "TP Vent Nozzle Environmentally Assisted Fatigue" dated December 2017	N/A	N/A	N/A
	Calculation Summary Sheet 32-9279367-001, "TP CRDM Latch Housing Environmentally Assisted Fatigue" dated December 2017	N/A	N/A	N/A

Coversheet Document Name	Areva EAF Calculations (Enclosure 5 Attachment 1 - SLRA Section 4 & Attachment 8) (Continued)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
	Calculation Summary Sheet 32-9280202-001, "TP CRDM Lower Joint Environmentally Assisted Fatigue," dated December 2017	N/A	N/A	N/A
Enclosure	2	N/A	N/A	N/A
Attachment	7	N/A	N/A	N/A
Date	12/15/2017	N/A	N/A	N/A

Coversheet Document Name	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 Westinghouse Type Nuclear Steam Supply Systems dated October 2017 (Enclosure 5 Attachment 10)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
Affidavit Document Name	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	N/A	N/A	N/A
Enclosure	2	N/A	N/A	N/A
Attachment	8	N/A	N/A	N/A
Date	12/04/2017	N/A	N/A	N/A

Coversheet Document Name	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)			
Supplement	Original SLRA	Supplement 1	Supplement 2	Supplement 3
ADAMS Accession No.	<a href="#">ML18037A829</a>	<a href="#">ML18044A653</a>	<a href="#">ML18053A137</a>	<a href="#">ML18072A230</a>
Affidavit Document Name	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	N/A	N/A	N/A
Enclosure	2	N/A	N/A	N/A
Attachment	9	N/A	N/A	N/A
Date	12/13/2017	N/A	N/A	N/A