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LTR-NRC-19-26

May 22, 2019

Subject: Submittal of "Handout for Pre-Submittal Meeting on Common Qualified Platform Topical Report (WCAP-16097-P-A) Planned Revisions NRC Meeting May 2019" (Proprietary)

Enclosed is the proprietary "Handout for Pre-Submittal Meeting on Common Qualified Platform Topical Report (WCAP-16097-P-A) Planned Revisions NRC Meeting May 2019" for a meeting to be held on May 30, 2019. Since this handout is for the closed meeting and due to the extensiveness of the proprietary information in the handout, a non-proprietary version will not be provided.

This submittal contains proprietary information of Westinghouse Electric Company LLC ("Westinghouse"). In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Nuclear Regulatory Commission's ("Commission's") regulations, we are enclosing with this submittal an Affidavit. The Affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission.

Correspondence with respect to the proprietary aspects of the Westinghouse Affidavit should reference AW-19-4894, and should be addressed to Camille T. Zozula, Manager, Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 1, Suite 165, Cranberry Township, PA 16066.

A handwritten signature in black ink, appearing to read "Camille T. Zozula".

Camille T. Zozula, Manager
Infrastructure & Facilities Licensing

cc: Joseph Holonich (NRC)
Ekaterina Lenning (NRC)
Dennis Morey (NRC)

Enclosures:

1. Affidavit AW-19-4894
2. Proprietary Information Notice and Copyright Notice
3. LTR-NRC-19-26 P-Attachment, Handout for Pre-Submittal Meeting on Common Qualified Platform Topical Report (WCAP-16097-P-A) Planned Revisions NRC Meeting May 2019

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Camille T. Zozula, have been specifically delegated and authorized to apply for withholding and execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse).
- (2) I am requesting the proprietary portions of LTR-NRC-19-26 be withheld from public disclosure under 10 CFR 2.390.
- (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 10 CFR 2.390, 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 and is not customarily disclosed to the public.
 - (ii) 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.
- (5) Westinghouse has policies in place to identify proprietary information. 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:

AFFIDAVIT

- (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.
- (6) The attached submittal contains proprietary information throughout, for the reasons set forth in Sections 5 (a) and (c) of this Affidavit. Accordingly, a redacted version would be of no value to the public.

AFFIDAVIT

I declare that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 21 May 2019

A handwritten signature in black ink, appearing to read "Camille T. Zozula", written over a horizontal line.

Camille T. Zozula, Manager
Infrastructure & Facilities Licensing

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and non-proprietary versions of a document, furnished to the NRC in connection with Westinghouse development and licensing of Updated NEXUS Cross-Section Methodology.

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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