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Your ref: Docket No. 71-9380
Our ref: LTR-LCPT-19-32

November 4, 2019

Subject: Supplement Application for USA/9380/B(U)F-96, Model No. Traveller STD & XL, Safety Analysis Report Revision 1

Reference: 1. Sloma-DeLosier, T., "Supplement Application for USA/9380/B(U)F-96, Model No. Traveller STD & XL," LTR-LCPT-19-29, Westinghouse Electric Co., dated Oct. 14, 2019.

Dear Director,

Based on recent communication with NRC staff, Westinghouse has updated Safety Analysis Report (SAR) to Revision 1. There are no design or technical changes to the SAR since the prior submittal, see Reference 1. Changes includes the Record of Revision and an update of page header details to 'Rev. 1, 11/2019.' Enclosure 3 includes the full non-proprietary SAR with redacted, non-public text, marked by brackets and blank text. Enclosure 4 includes the full proprietary SAR, with proprietary text visible, marked by brackets. The proprietary contents of the packaging and different fuel designs withheld from the initial SAR submittal are included in this submittal as well. Please refer to the affidavit in Enclosure 1.

One copy of the supplement application is submitted electronically via NRC Electronic Information Exchange (EIE) system and one is emailed to the Project Manager, Pierre Saverot. Additional electronic or hard copy submissions are available upon request. If you have any questions, or require additional information, please contact me. Thank you for your review time.

Best regards,

*

Tanya Sloma-DeLosier
Licensing Program Manager
Licensing, Compliance, and Package Technology
Westinghouse Electric Company LLC

**Electronically approved records are authenticated in the electronic document management system*

Enclosures:

Non-Proprietary Enclosures:

1. Affidavit AW-19-4966
2. Proprietary Information Notice and Copyright Notice
3. LTR-LCPT-19-32-NP Attachment
Non-Proprietary Safety Analysis Report Revision 1 Application for Certificate of Compliance for the Traveller PWR Fuel Shipping Package, NRC Certificate of Compliance USA/9380/B(U)F-96 (SAR Revision 1, dated November 2019)

Proprietary Enclosure:

4. LTR-LCPT-19-32-P Attachment
Proprietary Safety Analysis Report Revision 1 Application for Certificate of Compliance for the Traveller PWR Fuel Shipping Package, NRC Certificate of Compliance USA/9380/B(U)F-96 (SAR Revision 1, dated November 2019)

cc:

T. Grange, Westinghouse-UK
W. Stilwell, Westinghouse-USA
P. Saverot, US NRC

AFFIDAVIT

STATE OF SOUTH CAROLINA:

COUNTY OF RICHLAND:

- (1) I, William E. (Wes) Stilwell, 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-LCPT-19-32-P Attachment, "Proprietary Safety Analysis Report Revision 1 Application for Certificate of Compliance for the Traveller PWR Fuel Shipping Package, NRC Certificate of Compliance USA/9380/B(U)F-96 (SAR Revision 1, dated November 2019)" 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.

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- (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:
- (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 documents are bracketed and marked to indicate the bases for withholding. The justification for withholding 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

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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 (5)(a) through (f) of this 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: 11/4/2019



William E. (Wes) Stilwell, Manager
Global Packaging and Regulatory
Compliance

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and non-proprietary versions of a document, furnished to the NRC in connection with the application for Certificate of Compliance for the Traveller PWR Fuel Shipping Package, NRC Certificate of Compliance USA/9380/B(U)F-96, and may be used only for that purpose.

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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