



Westinghouse
Electric Corporation

Water Reactor
Divisions

Nuclear Technology Division

Box 355
Pittsburgh Pennsylvania 15230

NS-TMA-2266

June 30, 1980

Darrell G. Eisenhut, Director
Division of Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20014

Dear Mr. Eisenhut:

Reference: (a) NS-TMA-2206
(b) NS-TMA-2200
(c) NS-TMA-2265

Enclosed are:

1. Ten (10) copies of WCAP-9748, "Westinghouse Owners Group Asymmetric LOCA Load Evaluation - Phase C," June 1980, Proprietary.
2. Ten (10) copies of WCAP-9749, "Westinghouse Owners Group Asymmetric LOCA Load Evaluation - Phase C," June 1980, Non-Proprietary.

Also enclosed is one (1) copy of Application for Withholding AW-80-36.

These reports have been prepared for and are being submitted to the Staff at the request of the Westinghouse Owners Group of Operating Nuclear Power Plants who are participating in the evaluation of the effects of asymmetric LOCA loads on the integrity of the primary reactor coolant system (NRC Task Action Plan NRC-TAP-TOPIA-A-2). The information contained in these reports is only applicable to this Owners Group. Each participating utility will reference the appropriate information contained in these reports when addressing the asymmetric LOCA load issue for their particular plant.

These reports supersede the information provided in Reference (a) and include an evaluation of postulated reactor coolant pipe breaks inside the reactor cavity annulus including confirmation of the structural integrity of the reactor vessel and supports, reactor internal structures, fuel, and ECCS piping attached to the reactor coolant system. The integrity of the control rod drive mechanisms and primary equipment supports which may be affected by the postulated pipe breaks was also evaluated.

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June 30, 1980

The evaluations described in these reports have demonstrated the capability of the plants to withstand the effects of the postulated reactor vessel nozzle rupture. Additionally, it has been demonstrated that the appropriate systems and components will maintain their functional capability and insure a safe plant shutdown. The evaluations performed in Phase C incorporate, as part of the analysis assumptions, the plant modifications previously identified.

For some plants in the Owners Group no specific evaluations were performed in Phase C. For these plants it was previously determined that the burden incurred in upgrading is excessive, and separate submittals have been made to demonstrate the radiological and economic impact.

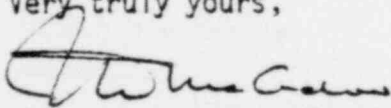
The Westinghouse Owners Group used a phased approach in the evaluation of asymmetric LOCA loads. Detailed results have been presented (Reference (b)) to the Staff for Phases A and B, which encompassed evaluations of the reactor coolant loop and component supports for selected postulated guillotine ruptures of the reactor coolant piping outside the primary shield wall. The conclusion from these evaluations is that the plants could withstand these postulated events assuming minor support modifications.

Concurrent with the Phase B and C evaluations, Westinghouse has conducted experimental and analytical investigations to determine the need to include a guillotine rupture of the reactor coolant piping as a reasonable design basis for their plants. The results of these efforts were submitted to the Staff by Reference (c).

This submittal contains proprietary information of Westinghouse Electric Corporation. In conformance with the requirements of 10CFR Section 2.790, as amended, of the Commission's regulations, we are enclosing with this submittal an application for withholding from public disclosure and an affidavit. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission.

Correspondence with respect to the affidavit or application for withholding should reference AW-80-36 and should be addressed to R. A. Wiesemann, Manager, Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P. O. Box 355, Pittsburgh, Pennsylvania 15230.

Very truly yours,


for T. M. Anderson, Manager
Nuclear Safety Department

J. J. McInerney/jaw

Enclosures

cc: Stephen Hosford - NRC Bethesda



Westinghouse
Electric Corporation

Water Reactor
Divisions

Nuclear Technology Division

Box 355
Pittsburgh Pennsylvania 15230

June 30, 1980
AW-80-36

Mr. Darrell Eisenhut, Director
Division of Operating Reactors
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20014

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

SUBJECT: Transmittal of WCAP's 9748 and 9749, "Westinghouse Owners Group
Asymmetric LOCA Load Evaluation - Phase C"

REF: Westinghouse Letter No. NS-TMA-2266, Anderson to Eisenhut; dated
June 30, 1980

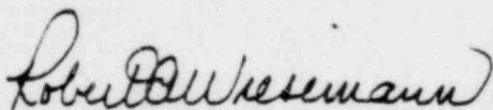
Dear Mr. Eisenhut:

The proprietary material transmitted by the referenced letter is of the same technical type as the proprietary material previously submitted concerning the analysis of the reactor coolant system for postulated loss-of-coolant accident. Further, the affidavits submitted to justify the material on June 15, 1977 and December 1, 1978, respectively, are equally applicable to this material.

Accordingly, withholding the subject information from public disclosure is requested in accordance with the previously submitted non-proprietary affidavits and applications for withholding, AW-77-27, dated June 15, 1977, and AW-78-84, dated December 1, 1978, a copy of which is attached. The previous submittals were further supported by a proprietary affidavit which was also sent to the Commission on June 15, 1977.

Correspondence with respect to this application for withholding or the accompanying affidavit should reference AW-80-36, and should be addressed to the undersigned.

Very truly yours,


Robert A. Wiesemann, Manager
Regulatory & Legislative Affairs

/bek
Attachment

cc: E. C. Shomaker, Esq. (NRC)

Westinghouse Electric Corporation Power Systems

PWR Systems Division

Box 355
Pittsburgh Pennsylvania 15230

AW-78-84
December 1, 1978

Mr. Olan Parr
Light Water Reactors Branch No. 3
Division of Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20014

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

SUBJECT: "Dynamic Analysis of the Reactor Coolant System for Loss of
Coolant Accidents: Salem Nuclear Generating Stations I and II"

REF: Westinghouse Letter No. NS-TMA-1996, Anderson to Parr, dated
December 1, 1978

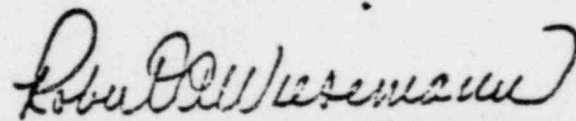
Dear Mr. Parr:

The proprietary material transmitted by the referenced letter is of the same technical type as the proprietary material previously submitted concerning the analysis of the reactor coolant system for postulated loss-of-coolant accident for the Indian Point 3 Nuclear Power Plant. Further, the affidavit submitted to justify the material previously submitted, AW-77-27, is equally applicable to this material.

Accordingly, withholding the subject information from public disclosure is requested in accordance with the previously submitted non-proprietary affidavit and application for withholding, AW-77-27, dated June 15, 1977, a copy of which is attached. The previous submittal was further supported by a proprietary affidavit which was also sent to the Commission on June 15, 1977.

Correspondence with respect to this application for withholding or the accompanying affidavit should reference AW-78-84, and should be addressed to the undersigned.

Very truly yours,


Robert A. Wiesemann, Manager
Regulatory & Legislative Affairs

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Attachment

cc: J. A. Cooke, Esq. (NRC)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

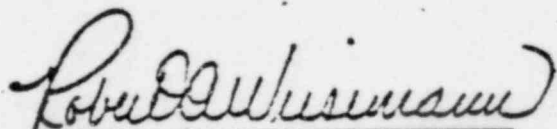
COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Robert A. Wiesemann, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Corporation ("Westinghouse") and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information and belief:

The proprietary material of Westinghouse being transmitted is of the same technical type as that proprietary material previously submitted to the Commission in June 1977.

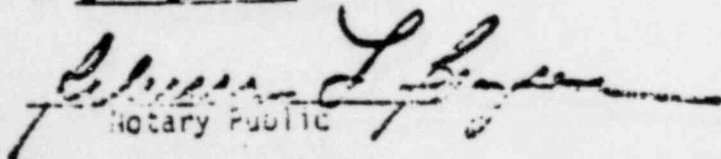
Justification for withholding such information from public disclosure has been provided by Westinghouse in a previously submitted non-proprietary affidavit, AW-77-27, dated June 15, 1977, which was approved by the Commission on June 14, 1978, a copy of which is attached. The previous submittal was further supported by a proprietary affidavit which was also sent to the Commission on June 15, 1977. The averments in that affidavit apply equally to the above referenced transmittal and are incorporated herein by reference.

Further the deponent sayeth not.



Robert A. Wiesemann, Manager
Regulatory & Legislative Affairs

Sworn to and subscribed
before me this 1 day
of December 1978.



Notary Public

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Robert A. Wieseemann, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Corporation ("Westinghouse") and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:

Robert A. Wieseemann

Robert A. Wieseemann, Manager
Licensing Programs

Sworn to and subscribed :
before me this 15 day
of June 1977.

Rebecca A. Lortice

Notary Public

REBECCA A. LORTICE, NOTARY PUBLIC
MONROEVILLE, PENNSYLVANIA
ALL PENNSYLVANIA COUNTY
BY COMMISSION EXPIRES APR. 15, 1978

- (1) I am Manager, Licensing Programs, in the Pressurized Water Reactor Systems Division, of Westinghouse Electric Corporation 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 or rule-making proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse Water Reactor Divisions.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.790 of the Commission's regulations and in conjunction with the Westinghouse application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedure utilized by Westinghouse Nuclear Energy Systems 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 2.790 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 constitutes Westinghouse policy and provides 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 of Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.
- (g) It is not the property of Westinghouse, but must be treated as proprietary by Westinghouse according to agreements with the owner.

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 which 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 in 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.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.790, it is to be received in confidence by the Commission.
- (iv) The information is not available in public sources to the best of our knowledge and belief.
 - (v) The proprietary information sought to be withheld in this submittal is that which is attached to Westinghouse Letter Number NS-CE-1460, Eicheldinger to Stello, dated June 15, 1977. The letter and attachment are being submitted in support of the Commission's review of the reactor pressure vessel supports analysis for Indian Point 3.

Public disclosure of the information sought to be withheld is likely to cause substantial harm to the competitive position of Westinghouse, taking into account the value of

the information to Westinghouse, the amount of effort and money expended by Westinghouse in developing the information, and considering the ways in which the information could be acquired or duplicated by others.

Further the deponent sayeth not.