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Mr. Darl S. Hood, Project Manager
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Division of Reactor Projects I/II
Office of Nuclear Reactors Regulation
Nuclear Regulatory Commission
Washington, DC 20555

August 21, 1991

RE: CAW-91-140

Dear Mr. Hood:

I have reviewed your letter requesting public disclosure of proprietary information contained within WCAP-12788, Revision 1, entitled "RTD Bypass Elimination Licensing Report for Vogtle Electric Generating Plant". Specifically, the proprietary nature of the information presented in Tables 2.1-1 and 3.1-4 was reviewed by the Westinghouse technical disciplines which generate and utilize the information.

The subject information has been classified as proprietary in accordance with designations (a) and (c) from Affidavit CAW-91-140. These designations refer to:

(a) distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of Westinghouses's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies, and

(c) use by a competitor which 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.

We have concluded that Table 2.1-1 can be released to the public without any significant harm to our competitive advantage in safety analysis methodology. However, the information presented in Table 3.1-4 reveals distinguishing aspects of Westinghouse supplied equipment that is specifically modeled in the methodology presented in the report for setpoint determination. Access to this information by our competitors would reduce their effort required to generate similar information, which we have defined at considerable expense of time and effort.

For example, Table 3.1-4 contains instrument uncertainty information (sensor/transmitter and process rack errors including the conversion to the working unit, % flow) derived from the following:

1) Equipment specifications required and verified by test at considerable Westinghouse expense as part of the various equipment qualification programs.
2) Process measurement accuracies for non-instrument related effects which were determined by Westinghouse by calculation, measurement or assumption and subsequently reviewed and approved by the NRC.
3) Procedural requirements specified by Westinghouse to ensure operation consistent with protection function operability requirements.
4) The results of parameter sensitivity calculations using a Westinghouse determined approach.

Westinghouse first developed this approach to instrument uncertainty calculation (using items 1 through 4 above) in 1977 and was first presented to the NRC in 1978. The approach has subsequently been refined with improvements provided in various plant specific submittals, e.g., Protection System Setpoint Studies, Improved Thermal Design Procedure reports and RTD Bypass Elimination reports with identical proprietary bracketing and coding noted in each. The overall combination methodology was first published in a non-proprietary form in an IEEE Nuclear Science Symposium paper in 1985. Thus, release of the information in Table 3.1-4, or information of a similar nature, would allow a competitor to perform uncertainty calculations on a plant with Westinghouse supplied equipment using a Westinghouse developed methodology and Westinghouse developed uncertainties without incurring the same or similar development costs. This would provide a considerable cost savings to a competitor in an area where, at this time, only the Westinghouse methodology has explicit NRC approval (see NUREG 0717 Supplement No. 4, August 1982).

An additional request for release of proprietary information on Table 3.1-8 from WCAP-12788, Revision 1 was discussed in a conference call with the NRC Staff on August 21, 1991. It was determined that the value for "N LOOP RCS FLOW UNCERTAINTY (WITH BIAS VALUES)" may be released to the public.

In conclusion, due to the distinguishing aspects of Westinghouse equipment which it may reveal, in addition to the reduction of a competitor's resource expenditure to generate similar information, we maintain our request for withholding public disclosure of Table 3.1-4 in WCAP-12788, Revision 1. The relative sensitivity of Table 2.1-1 and the value for N loop RCS flow uncertainty (with bias values) on Table 3.1-8 has been determined to be not as great and we therefore concur with releasing this information to the public.

Ronald P. DiPiazza

R. P. DiPiazza, Manager
Nuclear Safety Licensing
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TABLE 2.1-1

RESPONSE TIME PARAMETERS FOR RCS TEMPERATURE MEASUREMENT

	RTD Bypass System	Fast Response Thermowell RTD System
RTD Bypass Piping and Thermal Lag (sec)	2.0	NA
RTD Response Time (sec)	2.0	4.0
Electronics Delay (sec)	2.0	2.0
Total Response Time (sec)	6.0 sec	6.0 sec

TABLE 3.1-8

COLD LEG ELBOW TAP FLOW UNCERTAINTY

INSTRUMENT UNCERTAINTIES

	% DP SPAN	% FLOW
PMA =		+a,c
PEA =		
SCA =		
SPE =		
STE =		
SD =		
RCA =		
M&TE =		
RTE =		
RD =		
ID =		
A/D =		
RDOT =		
FLOW CALORIM. BIAS =		
FLOW CALORIMETRIC =		
INSTRUMENT SPAN =		
SINGLE LOOP ELBOW TAP FLOW UNC =		+a,c % FLOW
N LOOP ELBOW TAP FLOW UNC =		
N LOOP RCS FLOW UNCERTAINTY (WITH BIAS VALUES)		1.9