



Westinghouse  
Electric Corporation

Water Reactor  
Divisions

Nuclear Technology Division  
Box 355  
Pittsburgh Pennsylvania 15230

April 11, 1984  
CAW-84-25

Mr. Harold R. Denton, Director  
Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Phillips Building  
7920 Norfolk Avenue  
Bethesda, Maryland 20014

APPLICATION FOR WITHHOLDING PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE

REFERENCE: Letter from SNUPPS to NRC (Petrick to Denton), April 1984

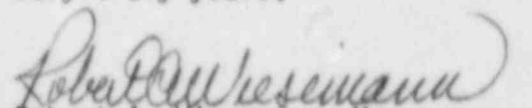
Dear Mr. Denton:

The proprietary material transmitted by the reference letter for which withholding is being requested by the Standardized Nuclear Unit Power Plant System (SNUPPS) is of the same technical type as that proprietary material previously submitted by Westinghouse concerning Reactor Protection System/Engineered Safety Features. The previous application for withholding, AW-76-60, was accompanied by an affidavit signed by the owner of the proprietary information, Westinghouse Electric Corporation. Further, the affidavit submitted to justify the previous material was approved by the Commission on April 17, 1978, and is equally applicable to the subject material. The subject proprietary material is being submitted by the Standardized Nuclear Unit Power Plant System (SNUPPS) for the Kansas City Power and Light Company's Wolf Creek (STN 50-482) and the Union Electric Company's Callaway (STN 50-483).

Accordingly, this letter authorizes the utilization by SNUPPS of the previously furnished affidavit. A copy of the affidavit, AW-76-60, dated December 1, 1976, is attached.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference CAW-84-25 and should be addressed to the undersigned.

Very truly yours,

  
Robert A. Wiesemann, Manager  
Regulatory & Legislative Affairs

/bek  
Attachment

cc: E. C. Shomaker, Esq.  
Office of the Executive Legal Director, NRC

8404180366 840416  
PDR ADOCK 05000482  
A PDR

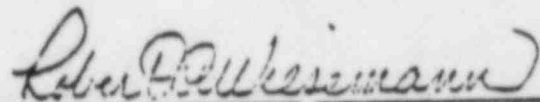
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

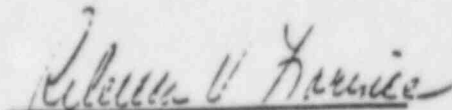
COUNTY OF ALLEGHENY:

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:



Robert A. Wiesemann, Manager  
Licensing Programs

Sworn to and subscribed  
before me this 4 day  
of December 1976.

  
Notary Public

- (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 procedures 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 to 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 appropriately marked in the attachment to Westinghouse letter number NS-CE-1298, Eicheldinger to Stolz, dated December 1, 1976, concerning information relating to NRC review of WCAP-8567-P and WCAP-8568 entitled, "Improved Thermal Design Procedure," defining the sensitivity of DNB ratio to various core parameters. The letter and attachment are being submitted in response to the NRC request at the October 29, 1976 NRC/Westinghouse meeting.

This information enables Westinghouse to:

- (a) Justify the Westinghouse design.
- (b) Assist its customers to obtain licenses.
- (c) Meet warranties.
- (d) Provide greater operational flexibility to customers assuring them of safe and reliable operation.
- (e) Justify increased power capability or operating margin for plants while assuring safe and reliable operation.

- (f) Optimize reactor design and performance while maintaining a high level of fuel integrity.

Further, the information gained from the improved thermal design procedure is of significant commercial value as follows:

- (a) Westinghouse uses the information to perform and justify analyses which are sold to customers.
- (b) Westinghouse sells analysis services based upon the experience gained and the methods developed.

Public disclosure of this information concerning design procedures is likely to cause substantial harm to the competitive position of Westinghouse because competitors could utilize this information to assess and justify their own designs without commensurate expense.

The parametric analyses performed and their evaluation represent a considerable amount of highly qualified development effort. This work was contingent upon a design method development program which has been underway during the past two years. Altogether, a substantial amount of money and effort has been expended by Westinghouse which could only be duplicated by a competitor if he were to invest similar sums of money and provided he had the appropriate talent available.

Further the deponent sayeth not.



Response to NRC Request<sup>(1)</sup> 420.10  
for Additional Information as Follows:

- 420.10 Provide a complete set of interconnecting wiring diagrams and process control block diagrams associated with the pressurizer pressure input channels as verification of the installed design prior to April 20, 1984.

Reference 1: Enclosure to SNUPPS Letter to Westinghouse SLW 84-0016 (File 0278) J. O. Cermak to L. R. Benson of March 14, 1984.

SNUPPS/Westinghouse Interconnecting Wiring Diagrams  
and Process Control Block Diagram Associated  
with Pressurizer Pressure Input

<u>Drawing No.</u>	<u>Sheet No.</u>	<u>Revision No.</u>	<u>Title</u>
1145E01 (Proprietary)	2 of 4	10	Standardized Nuclear Unit Power Plant System Projects Reactor Coolant System Flow Diagram
8756D37	12	5	SNUPPS Process Control Block Diagram
8809D51	27	8	Interconnecting Wiring Diagram (Cabinet 01) SNUPPS Nuclear Power Plant Controls
8809D51	28	8	Interconnecting Wiring Diagram (Cabinet 01) SNUPPS Nuclear Power Plant Controls
8809D52	27	8	Interconnecting Wiring Diagram (Cabinet 02) SNUPPS Nuclear Power Plant Controls
8809D52	28	8	Interconnecting Wiring Diagram (Cabinet 02) SNUPPS Nuclear Power Plant Controls
8809D53	27	8	Interconnecting Wiring Diagram (Cabinet 03) SNUPPS Nuclear Power Plant Controls
8809D53	28	8	Interconnecting Wiring Diagram (Cabinet 03) SNUPPS Nuclear Power Plant Controls
8809D54	27	8	Interconnecting Wiring Diagram (Cabinet 04) SNUPPS Nuclear Power Plant Controls
8809D54	28	8	Interconnercting Wiring Diagram (Cabinet 04) SNUPPS Nuclear Power Plant Controls

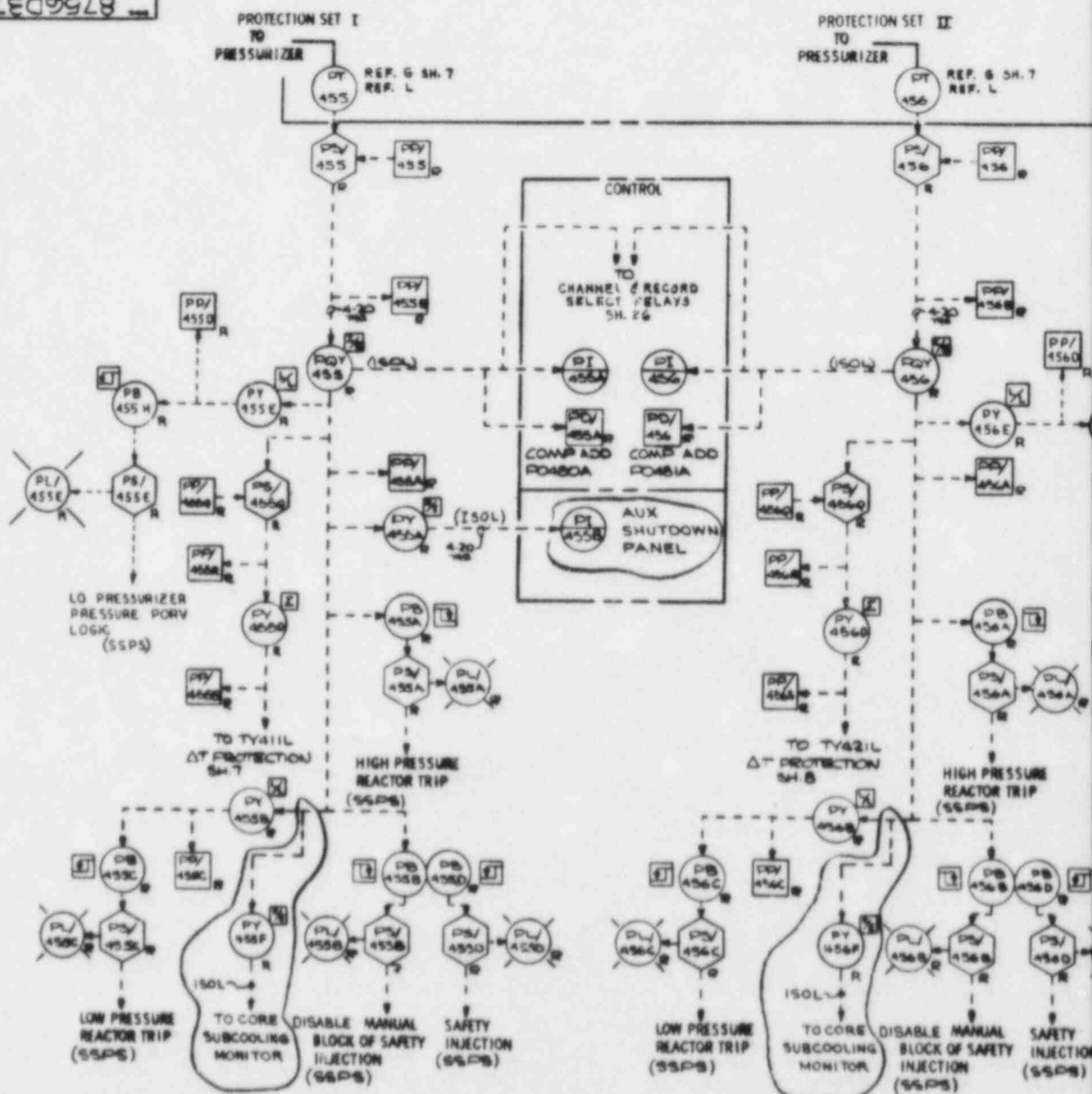
PROPRIETARY DIAGRAM  
DELETED FROM THIS DOCUMENT

Westinghouse Drawing 1145E01

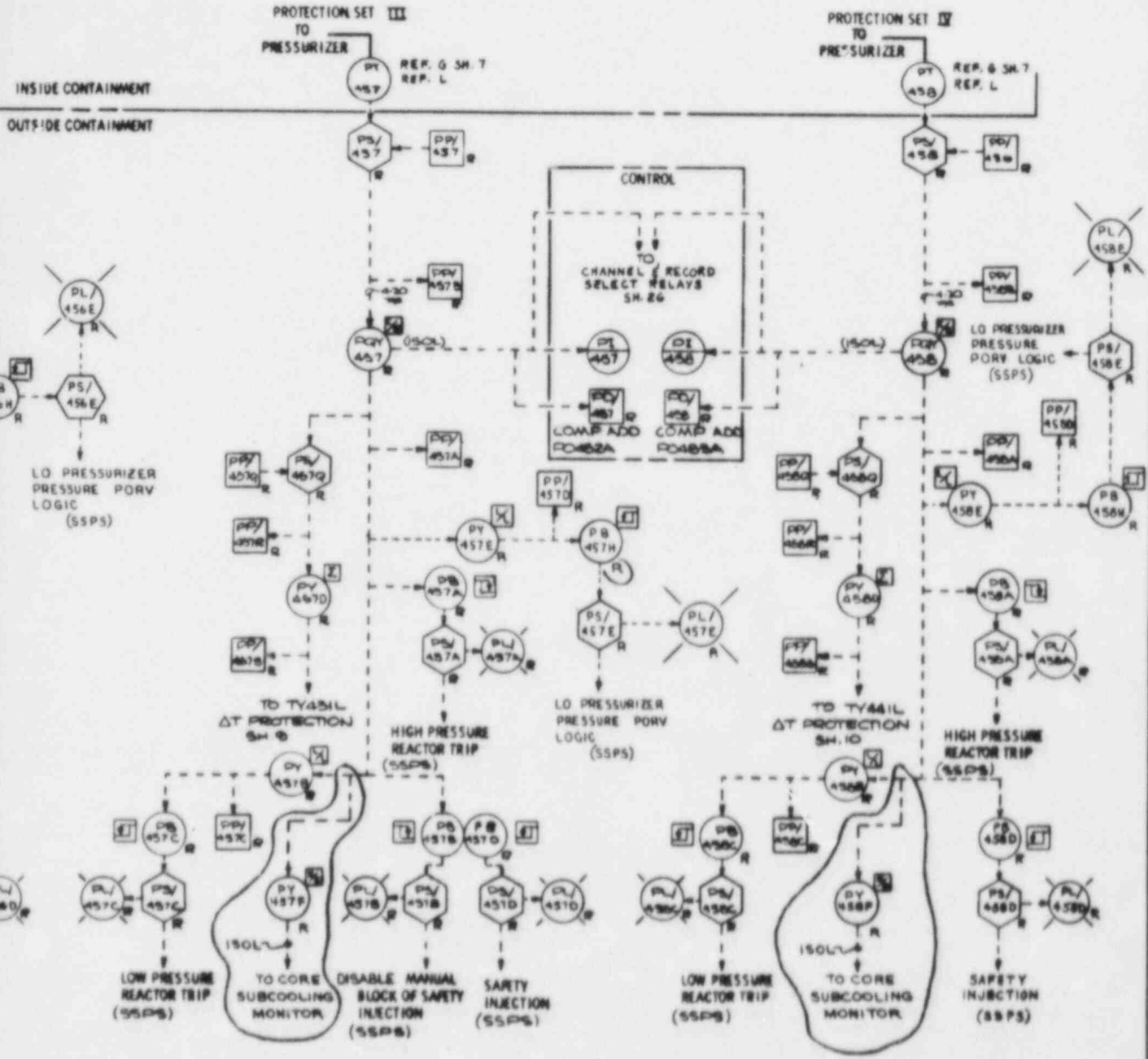
Sheet 2 of 4 Revision 10

Title:

Standardized Nuclear Unit Power Plant System Projects  
Reactor Coolant System Flow Diagram



1	CHARGE	SNP-330	3
2	SNP-330	ECN-31169	3
3	CHARGE	SNP-330	4
4	CHARGE	SNP-330	4
5	CHARGE	SNP-330	4
6	CHARGE	SNP-330	4
7	CHARGE	SNP-330	4
8	CHARGE	SNP-330	4
9	CHARGE	SNP-330	4
10	CHARGE	SNP-330	4
11	CHARGE	SNP-330	4
12	CHARGE	SNP-330	4
13	CHARGE	SNP-330	4
14	CHARGE	SNP-330	4
15	CHARGE	SNP-330	4
16	CHARGE	SNP-330	4
17	CHARGE	SNP-330	4
18	CHARGE	SNP-330	4
19	CHARGE	SNP-330	4
20	CHARGE	SNP-330	4
21	CHARGE	SNP-330	4
22	CHARGE	SNP-330	4
23	CHARGE	SNP-330	4
24	CHARGE	SNP-330	4
25	CHARGE	SNP-330	4
26	CHARGE	SNP-330	4
27	CHARGE	SNP-330	4
28	CHARGE	SNP-330	4
29	CHARGE	SNP-330	4
30	CHARGE	SNP-330	4
31	CHARGE	SNP-330	4
32	CHARGE	SNP-330	4
33	CHARGE	SNP-330	4
34	CHARGE	SNP-330	4
35	CHARGE	SNP-330	4
36	CHARGE	SNP-330	4
37	CHARGE	SNP-330	4
38	CHARGE	SNP-330	4
39	CHARGE	SNP-330	4
40	CHARGE	SNP-330	4
41	CHARGE	SNP-330	4
42	CHARGE	SNP-330	4
43	CHARGE	SNP-330	4
44	CHARGE	SNP-330	4
45	CHARGE	SNP-330	4
46	CHARGE	SNP-330	4
47	CHARGE	SNP-330	4
48	CHARGE	SNP-330	4
49	CHARGE	SNP-330	4
50	CHARGE	SNP-330	4
51	CHARGE	SNP-330	4
52	CHARGE	SNP-330	4
53	CHARGE	SNP-330	4
54	CHARGE	SNP-330	4
55	CHARGE	SNP-330	4
56	CHARGE	SNP-330	4
57	CHARGE	SNP-330	4
58	CHARGE	SNP-330	4
59	CHARGE	SNP-330	4
60	CHARGE	SNP-330	4
61	CHARGE	SNP-330	4
62	CHARGE	SNP-330	4
63	CHARGE	SNP-330	4
64	CHARGE	SNP-330	4
65	CHARGE	SNP-330	4
66	CHARGE	SNP-330	4
67	CHARGE	SNP-330	4
68	CHARGE	SNP-330	4
69	CHARGE	SNP-330	4
70	CHARGE	SNP-330	4
71	CHARGE	SNP-330	4
72	CHARGE	SNP-330	4
73	CHARGE	SNP-330	4
74	CHARGE	SNP-330	4
75	CHARGE	SNP-330	4
76	CHARGE	SNP-330	4
77	CHARGE	SNP-330	4
78	CHARGE	SNP-330	4
79	CHARGE	SNP-330	4
80	CHARGE	SNP-330	4
81	CHARGE	SNP-330	4
82	CHARGE	SNP-330	4
83	CHARGE	SNP-330	4
84	CHARGE	SNP-330	4
85	CHARGE	SNP-330	4
86	CHARGE	SNP-330	4
87	CHARGE	SNP-330	4
88	CHARGE	SNP-330	4
89	CHARGE	SNP-330	4
90	CHARGE	SNP-330	4
91	CHARGE	SNP-330	4
92	CHARGE	SNP-330	4
93	CHARGE	SNP-330	4
94	CHARGE	SNP-330	4
95	CHARGE	SNP-330	4
96	CHARGE	SNP-330	4
97	CHARGE	SNP-330	4
98	CHARGE	SNP-330	4
99	CHARGE	SNP-330	4
100	CHARGE	SNP-330	4



TI  
PERTURE  
CARD

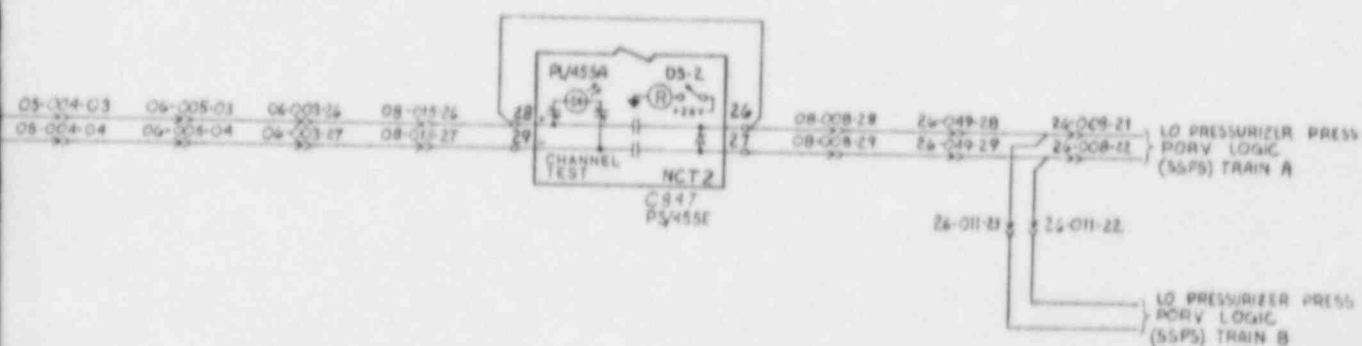
Also Available On  
Aperture Card

NOTE: PRESSURIZER PRESSURE  
PROTECTION SETS I, II, III, IV  
SEE SH.1 FOR NOTES & REFERENCES

WORKSHEET TITLE DATE BY CHECKED APPROVED DATE		Westinghouse Electric Corporation NUCLEAR ENERGY DIVISION, PITTSBURGH, PA., U.S.A. TITLE NUMBER PROCESSING CONTROL BLOCK DIAG. 8756037 SHEET 12 WORKSHEET
---	--	--







TI  
APERTURE  
CARD

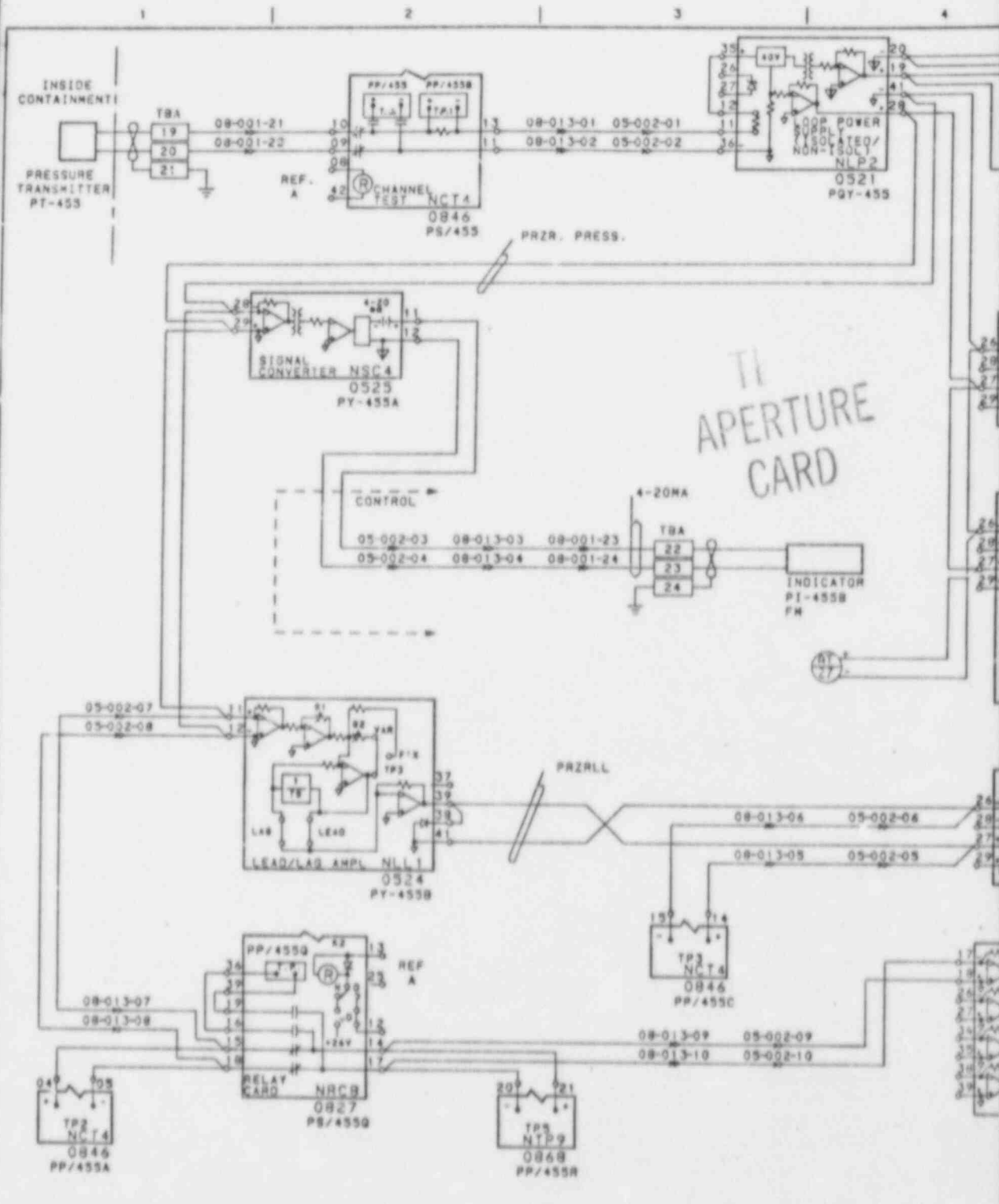
BEST AVAILABLE COPY

Also Available On  
Aperture Card

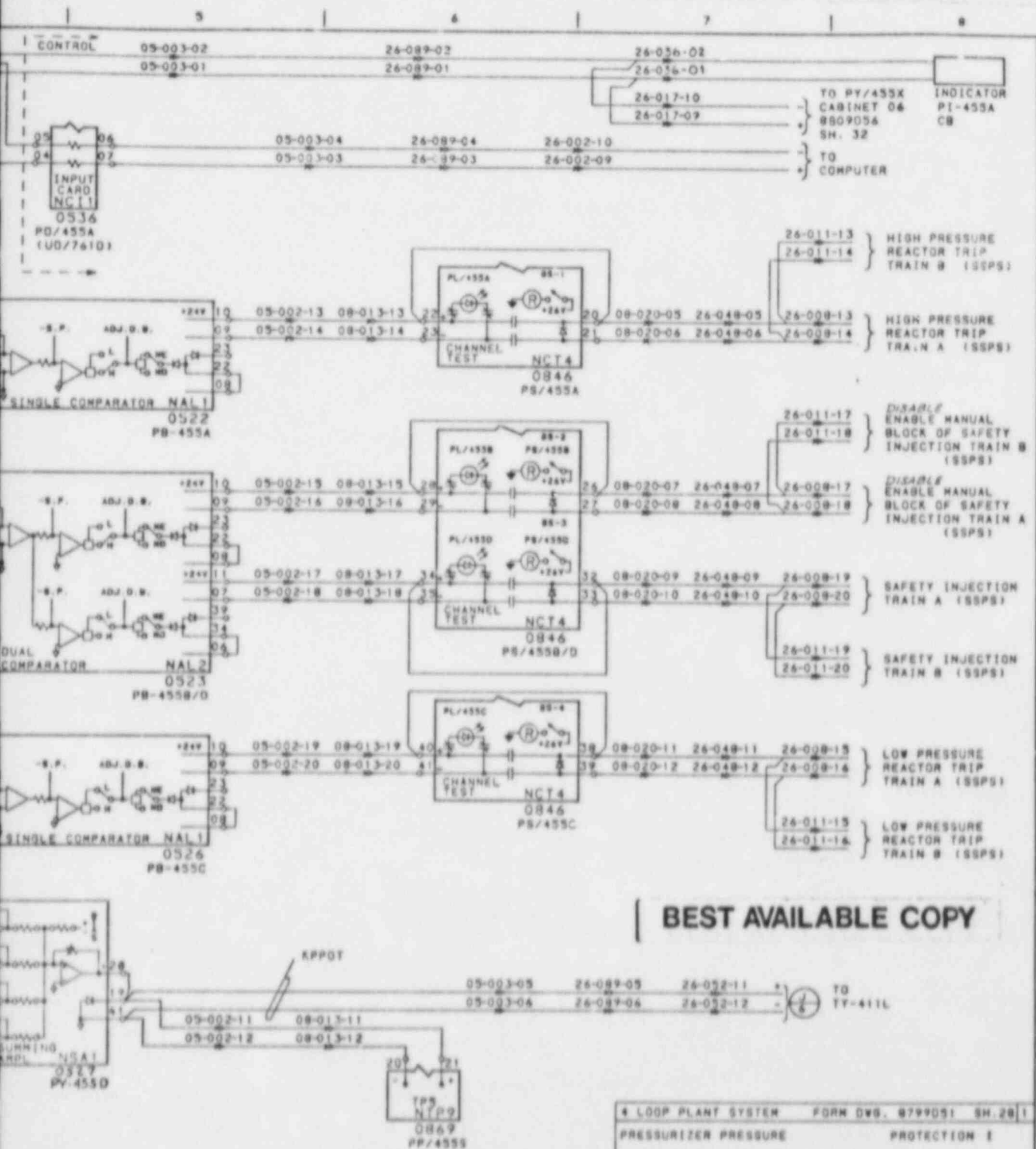
PRESSURIZER PRESSURE		PROTECTION I	
CABINET 01		CARD FRAME 05	
WESTINGHOUSE ELECTRIC CORPORATION			
TITLE INTERCONNECTING WIRING DIAGRAM CAB 01			
SNUPPS NUCLEAR POWER PLANT CONTROLS			
DRAWING NO. 8809051		SCALE	
DATE	BY	DATE	BY
1966	W.B.	1966	
INDUSTRY SYSTEMS DIVISION		PITTSBURGH, PA. 15101	

84041803'66-02

36



17	ASU 20444
18	ASU 20444
19	ASU 20444
20	ASU 20444
21	ASU 20444
22	ASU 20444
23	ASU 20444
24	ASU 20444
25	ASU 20444
26	ASU 20444
27	ASU 20444
28	ASU 20444
29	ASU 20444
30	ASU 20444
31	ASU 20444
32	ASU 20444
33	ASU 20444
34	ASU 20444
35	ASU 20444
36	ASU 20444
37	ASU 20444
38	ASU 20444
39	ASU 20444
40	ASU 20444
41	ASU 20444
42	ASU 20444
43	ASU 20444
44	ASU 20444
45	ASU 20444
46	ASU 20444
47	ASU 20444
48	ASU 20444
49	ASU 20444
50	ASU 20444



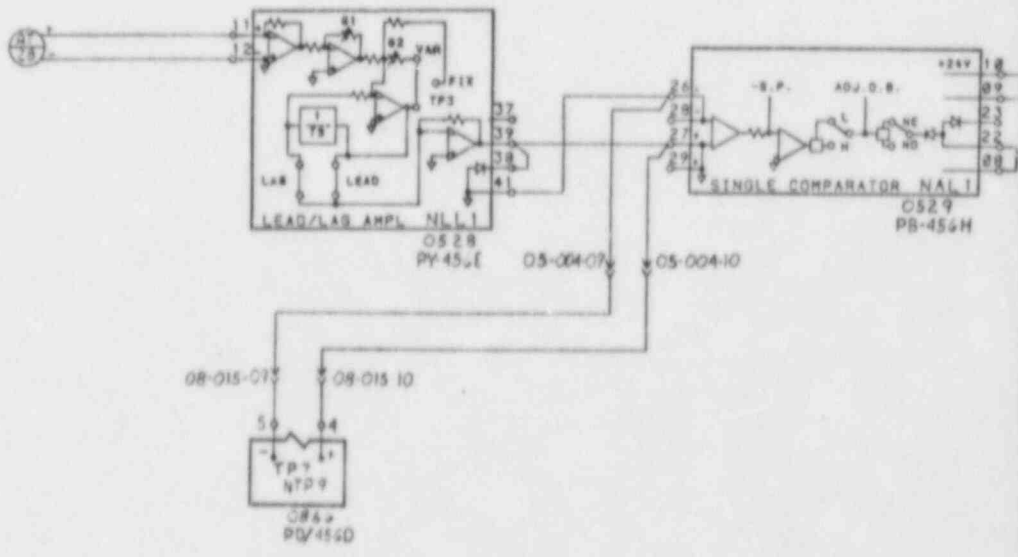
BEST AVAILABLE COPY

Also Available On  
Aperture Card

24  
8404180366-03

36

8 | 7 | 6 | 5



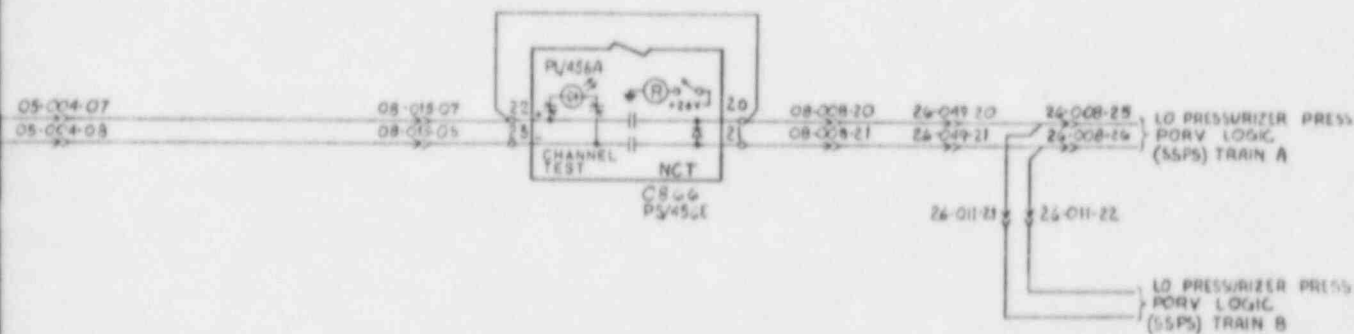
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10
1	2	3	4	5	6	7	8	9	10

D

C

B

A



TI  
APERTURE  
CARD

BEST AVAILABLE COPY

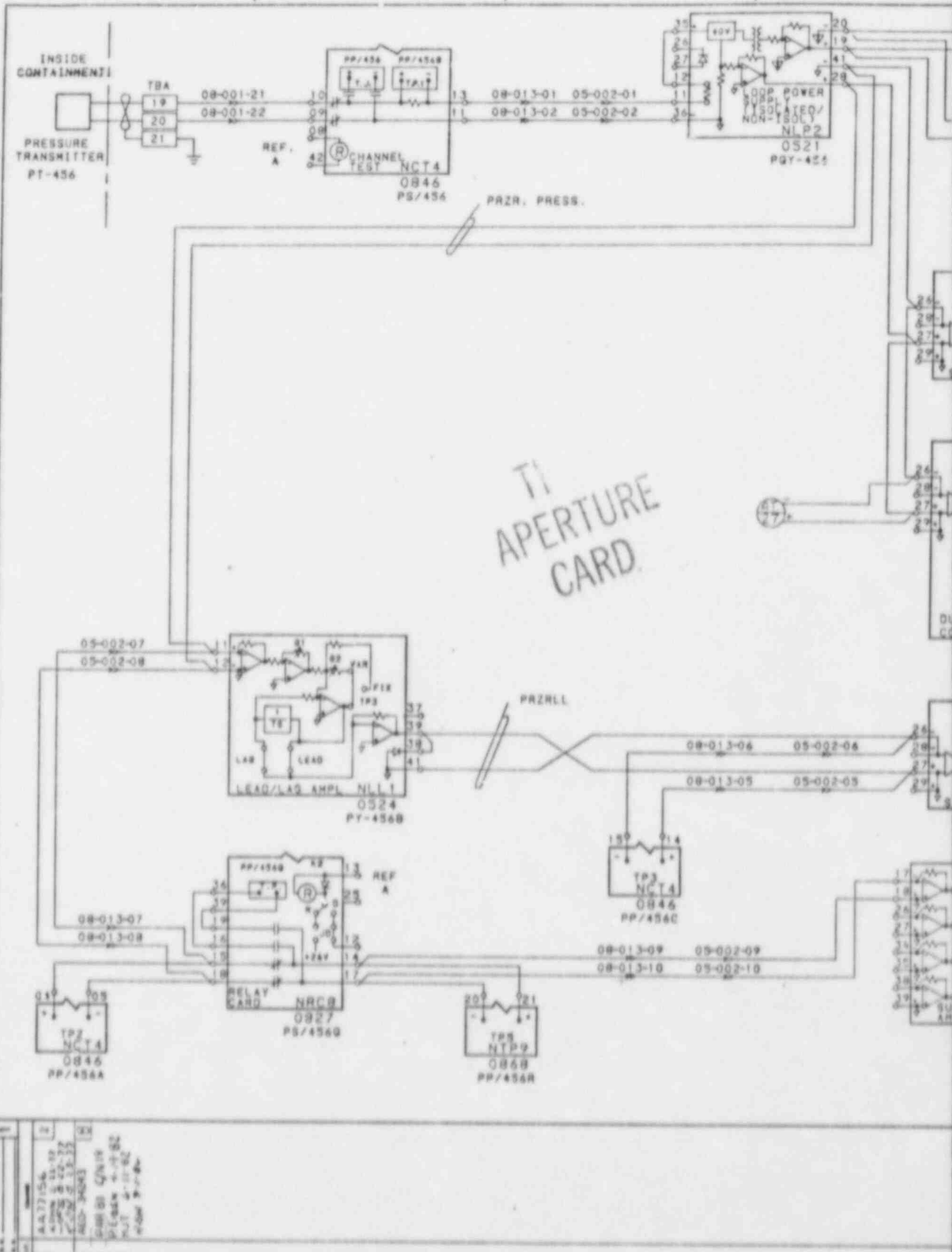
Also Available On  
Aperture Card

TOP LEVEL IND.  
DESIGN RESP.  
CLASSIFICATION  
RETRIEVAL CODE  
PRODUCT FAMILY

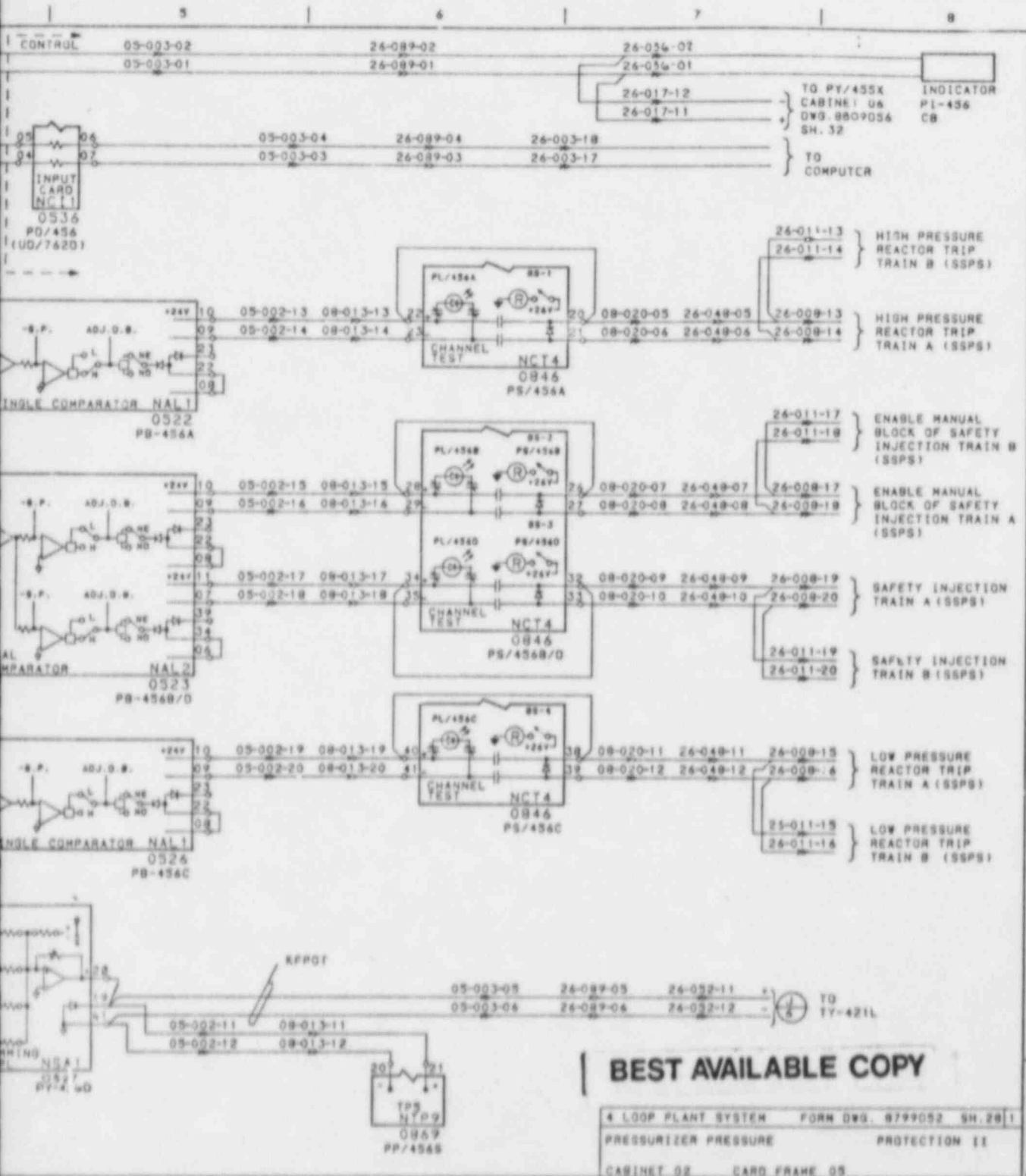
PRESSURIZER PRESSURE		PROTECTION II	
CABINET 02		CARD FRAME 05	
WESTINGHOUSE ELECTRIC CORPORATION (W)			
TITLE INTERCONNECTING WIRING DIAG. M CAB 01			
SNAPS NUCLEAR POWER PLANT CONTROLS			
REVISION 100 10 10000 SCALE			
REV. 100 10 10000	REV. 100 10 10000	REV. 100 10 10000	REV. 100 10 10000
REV. 100 10 10000	REV. 100 10 10000	REV. 100 10 10000	REV. 100 10 10000
8809052			SHEET 17
INDUSTRY SYSTEMS DIVISION			PITTSBURGH PA 15001

8404180365-04

36







**BEST AVAILABLE COPY**

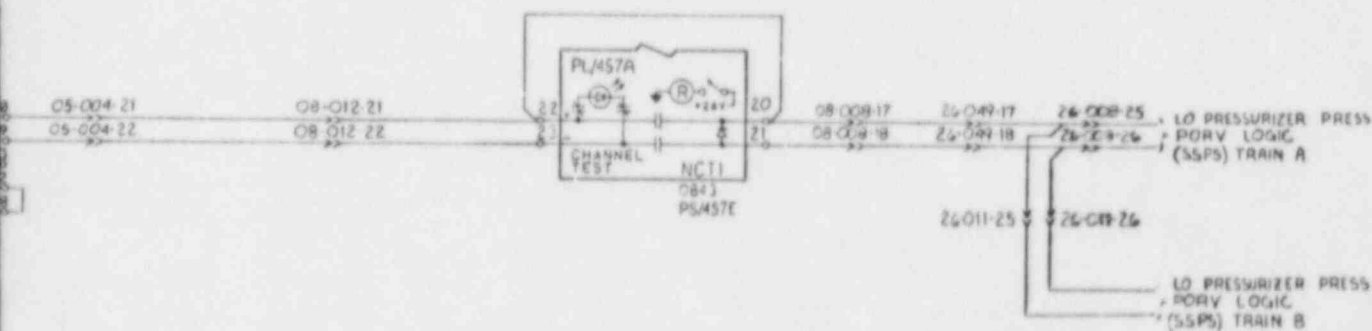
4 LOOP PLANT SYSTEM		FORM DWG. 8799052 SH.2811
PRESSURIZER PRESSURE		PROTECTION II
CABINET 02		CARD FRAME 05
WESTINGHOUSE ELECTRIC CORPORATION		
TITLE INTERCONNECTING WIRING DIAGRAM CABINET 02		
SHOPS NUCLEAR POWER PLANT CONTROLS		
REVISION NO. 10	SCALE	
WIRING/BIRES	DATE	8809052
CHK. JFS	APP. JFS	SHEET 28
INDUSTRY SYSTEMS DIVISION		WESTINGHOUSE

Also Available On  
Aperture Card

8404180366-05

36





TI  
APERTURE  
CARD

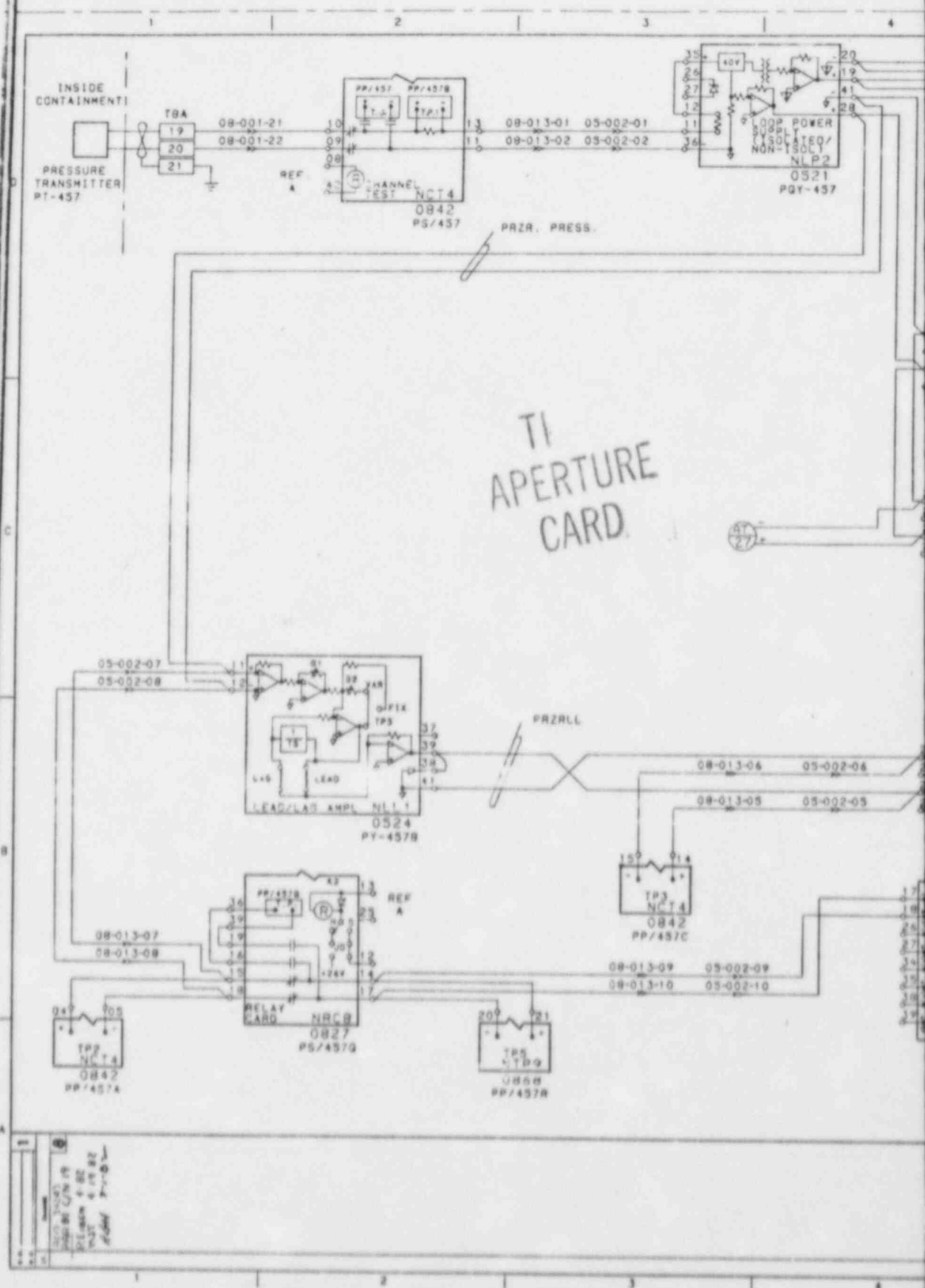
BEST AVAILABLE COPY

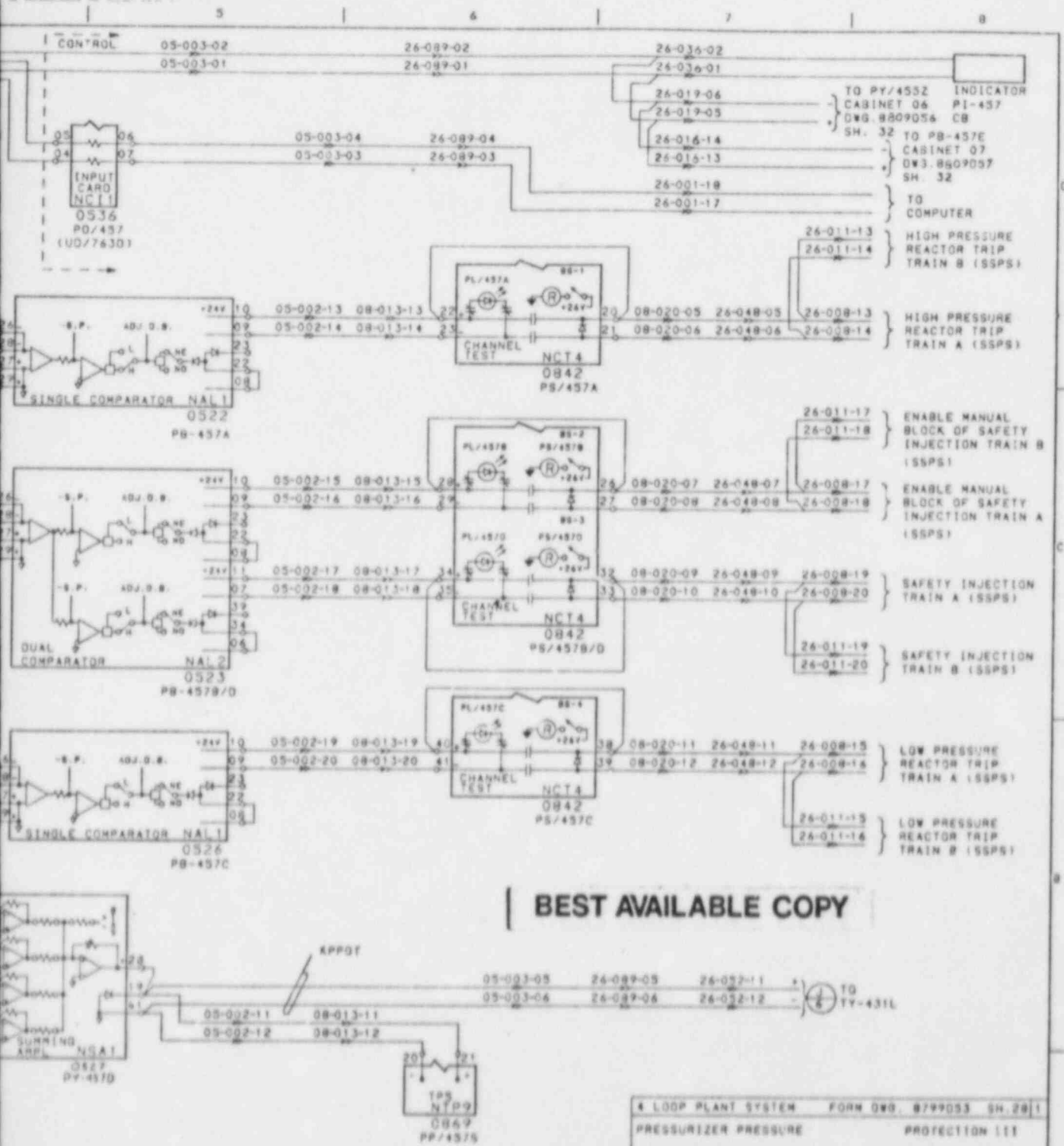
Also Available On  
Aperture Card

TOP LEVEL IND.	05000000	WESTINGHOUSE ELECTRIC CORPORATION (W)
DESIGN RESP.		TITLE INTERCONNECTING WIRING DIAGRAM CAB
CLASSIFICATION		SSPS NUCLEAR POWER PLANT CONTROLS
RETRIEVAL CODE		REVISION 10 (1960) SCALE 1
PRODUCT FAMILY		6809053
		6809053
		INDUSTRY SYSTEMS DIVISION

8404180366 -06

36





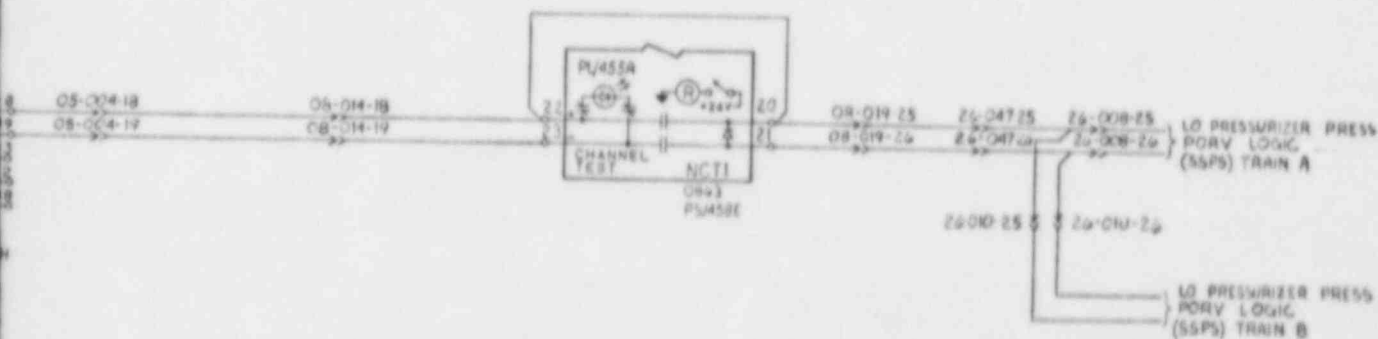
BEST AVAILABLE COPY

Also Available On  
Aperture Card

4 LOOP PLANT SYSTEM		FORM DWG. 8799053	SH. 28/1
PRESSURIZER PRESSURE		PROTECTION III	
CABINET 03		CARD FRAME 05	
WESTINGHOUSE ELECTRIC CORPORATION (W)			
TITLE INTERCONNECTING WIRING DIAGRAM CABINET 03			
SHUPPS NUCLEAR POWER PLANT CONTROLS			
DRAWING NO. 1000000			
SCALE		8809053	
DATE 1/25/66		SHEET 28	
INDUSTRY SYSTEMS DIVISION			







TI  
APERTURE  
CARD

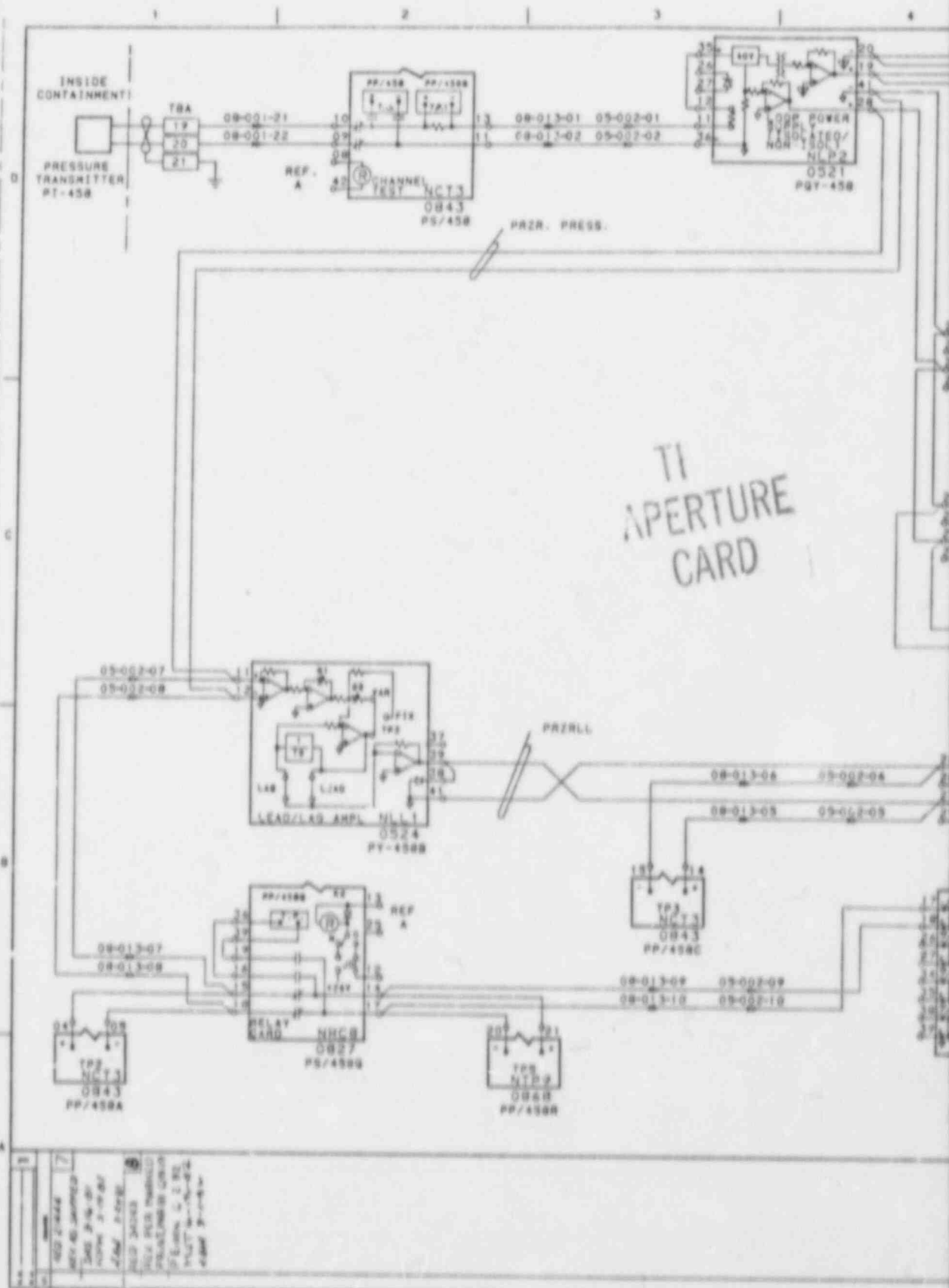
BEST AVAILABLE COPY

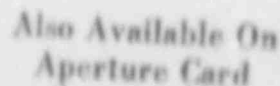
Also Available On  
Aperture Card

PRESSURIZER PRESSURE		PROTECTION IX	
CABINET 04		CARD FRAME 05	
WESTINGHOUSE ELECTRIC CORPORATION (W)			
TITLE INTERCONNECTING WIRING DIAGRAM CAB 04			
SHAWNEE NUCLEAR POWER PLANT CONTROLS			
REVISIONS IN CHARGE SCALE			
REV. 1	DATE	BY	DATE
1	10-1-68	W. B.	10-1-68
8809054		PAGE 22	
INDUSTRY SYSTEMS DIVISION			

8404180366-08

36





24 8404180366-89