

Docket File
52-003



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 8, 1998

Mr. Brian A. McIntyre, Manager
Advanced Plant Safety and Licensing
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, PA 15230-0355

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
FOR THE WESTINGHOUSE AP600 STANDARD SAFETY ANALYSIS REPORT
(SSAR) AND PROBABILISTIC RISK ASSESSMENT (PRA)

Dear Mr. McIntyre:

In an August 23, 1995, letter, the staff informed Westinghouse that it had reviewed the AP600 SSAR through Revision 4, and the PRA through Revision 5 and determined that in nine areas the information sought to be withheld did not contain trade secrets or proprietary commercial information. The letter requested Westinghouse to reevaluate the SSAR and PRA materials to ensure that the information that it was requesting to be withheld from public disclosure met the criteria set forth in 10 CFR 2.790(b)(4). This request was reiterated in a letter sent to you on July 1, 1998.

Westinghouse responded to the staff's requests in letters dated July 22, 1998, (NSD-NRC-98-5741) and August 17, 1998 (NSD-NRC-98-5759). In these letters Westinghouse provided additional information for why some of the material should still be considered proprietary and also indicated that some of the material was no longer considered proprietary. The enclosure to this letter provides the proprietary disposition for the nine areas.

We have reviewed your submittals in accordance with the requirements of 10 CFR 2.790 and, on the basis of Westinghouse's statements, have determined that the submitted information sought to be withheld as documented in the enclosure contains trade secrets or proprietary commercial information.

Therefore, we have determined that the proprietary materials documented in the enclosure, which when submitted to the NRC were marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.790(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public disclosure should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You should understand that the NRC may have cause to review this

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Mr. Brian A. McIntyre

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determination in the future, for example, if the scope of a Freedom of Information Act request includes your withheld information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

The material that is no longer considered as proprietary, as documented in the enclosure, will be released to the NRC Public Document Room.

Sincerely,

original signed by:

Joseph M. Sebrosky, Project Manager
Standardization Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 52-003

Enclosure: As stated

cc w/encl: See next page

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Mr. Brian A. McIntyre
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Docket No. 52-003
AP600

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AP600

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Disposition of SSAR and PRA Proprietary Information

1. SSAR Chapter 1 - General Arrangement Drawings

The general arrangement drawings in the early SSAR revisions were detailed construction drawings. Westinghouse subsequently provided simplified non-proprietary general arrangement drawings in the SSAR in Revision 7. In your July 22, 1998, letter you indicated that Westinghouse still considers that the drawings in Revisions 0 through 6 of the SSAR contain proprietary information. The staff notes that it has already found SSAR revisions 5 and 6 contain proprietary information as documented in a July 14, 1998, letter.

Therefore, the staff has determined that the general arrangement drawings provided in SSAR Revisions 0 through 4, which were designated as proprietary, contain trade secrets or proprietary information and will be withheld from the public.

2. SSAR Appendix 3B

As noted in Westinghouse's July 22, 1998, letter the information on the stress/strain curves for 316 steel are not considered proprietary. Therefore, this information found in SSAR Revision 0 through 4 will be released to the NRC Public Document Room.

3. SSAR Chapters 5, 6, 9, and 11 - Piping and Instrumentation drawings for certain systems.

The piping and instrumentation drawings in the early SSAR revisions were detailed construction drawings. Westinghouse subsequently provided simplified non-proprietary drawings in the SSAR in Revisions 7, 8 and 9. In your July 22, 1998, letter you indicated that Westinghouse still considers that the drawings in Revisions 0 through 6 of the SSAR contain proprietary information.

Therefore, the staff has determined that the piping and instrumentation drawings for SSAR Chapters 5, 6, 9, and 11 provided in Revisions 0 through 4, which were designated as proprietary, contain trade secrets or proprietary information and will be withheld from the public.

4. SSAR Chapter 9 - Table 9.2.2-2

The information in Table 9.2.2-2, "Component Cooling Water System Flows and Heat Loads" was based on detailed component sizing calculations. A simplified nonproprietary version of Table 9.2.2-2 was developed and included in SSAR Revision 9. In your July 22, 1998, letter you indicated that Westinghouse still considers that the Table in Revisions 0 through 6 of the SSAR contain proprietary information.

Therefore, the staff has determined that SSAR table 9.2.2-2 provided in SSAR Revisions 0 through 4, which was designated as proprietary, contains trade secrets or proprietary information and will be withheld from the public.

Enclosure

5. SSAR Chapter 10 - Figures 10.1-1 and 10.2-1

As noted in Westinghouse's July 22, 1998, letter these figures are not considered proprietary. Therefore, this information found in SSAR Revisions 0 through 4 will be released to the NRC Public Document Room.

6. SSAR Chapter 15 - Appendices 15B, 15C, and 15D

These appendices contain details of the methodology used in the LOCA and transient analyses. The information was subsequently moved to WCAP-14601 and a nonproprietary version of the report was provided to the NRC. In addition, nonproprietary general descriptions of the safety analysis computer codes are provided in the current Revision of the SSAR. Westinghouse submitted WCAP-14601, "AP600 Accident Analyses - Evaluation Models" in a letter dated July 14, 1997, (NSD-NRC-97-5232) and submitted a revision in a letter dated June 16, 1998, (NSD-NRC-98-5712). The staff found these submittals contained proprietary information as documented in letters dated June 22, 1998, and July 30, 1998, respectively. In your July 22, 1998, letter you indicated that Westinghouse still considers the detailed information provided in Revisions 0 through 6 of the SSAR contains proprietary information.

Therefore, the staff has determined that Appendices 15B, 15C, and 15D provided in Revisions 0 through 4, which were designated as proprietary, contain trade secrets or proprietary information and will be withheld from the public.

7. SSAR Chapter 18

In the August 23, 1995, letter the staff stated that it believed the following portions of Chapter 18 should no longer be treated as proprietary:

- Table 18.5-1 and 18.5-2
- Section 18.6 - decision model discussion
- Section 18.8 - model of human decision making and evaluation approach
- Section 18.9.2.4 - alarm system architecture
- Section 18.9.8.1 - development of emergency operating procedures
- Section 18.9.8.6.3 - computerized procedures
- Tables 18.9.8-1 through 18.9.8-37 - emergency response guidelines (ERGs)

In your July 22, 1998, letter you indicated that some of this material was no longer considered proprietary by Westinghouse. You also requested that other portions be withdrawn from the docket. The staff indicated to you that this information helped to form the basis of Chapter 18 of the AP600 Final Safety Evaluation Report (FSER). Therefore, withdrawing the information from the docket would not be possible without an extensive rewrite of Chapter 18 of the FSER. Based on this conversation with the staff you stated in an August 17, 1998, letter that Westinghouse no longer considered the above information proprietary. Therefore, the above information found in SSAR Revisions 0 through 4 will be placed in the NRC Public Document Room.

8. PRA Chapter 22 - Figures 22-1 and 22-2

A simplified non-proprietary version of these figures was provided in Revision 7 of the PRA. In your July 22, 1998, letter you indicated that Westinghouse still considers the figures in Revision 0 through 6 of the PRA to be proprietary. The staff notes that no proprietary information was submitted in PRA Revisions 3 through 6.

Therefore, the staff has determined that the figures provided in PRA Revisions 0 through 2, which were designated as proprietary, contains trade secrets or proprietary information and will be withheld from the public.

9. PRA Chapter 48 - Location of Hydrogen igniters.

As noted in your July 22, 1998, letter this information is no longer considered proprietary by Westinghouse. Therefore, this information found in PRA Revisions 0 through 2 will be released to the NRC Public Document Room.