

[REDACTED]

Attachment to NTD-NRC-94-4041

Revise the Manual Actuation Function list in Subsection 7.7.1.11 as follows:

Manual Actuation Function

The manual actuation function of the diverse actuation system is implemented by wiring the control board mounted switches directly to the final loads in a way that completely bypasses the normal path through the control board multiplexers, the engineered safety features actuation cabinets, the integrated logic cabinets and the diverse actuation system automatic logic.

The diverse manual functions are:

- Reactor and turbine trip
- Passive residual heat removal actuation
- Core makeup tank actuation
- Automatic depressurization system valve actuation
- Passive containment cooling actuation
- Critical containment penetration isolation
- Containment hydrogen ignitor actuation
- ~~Steam generator overfill prevention~~

Revise the Indication list in Subsection 7.7.1.11 as follows:

Indication

To support the diverse manual actuations, sensor outputs are displayed in the main control room in a manner that is diverse from the protection system display functions. The indications that are provided from at least two sensors per function are:

- Wide range steam generator water level - for reactor trip and passive residual heat removal actuations
- Hot leg temperature - for passive residual heat removal and automatic depressurization system actuations
- Hot leg level - for in-containment refueling water storage tank injection initiation
- Pressurizer level - for core makeup tank actuation and reactor coolant pump trip
- Containment temperature - for containment isolation and passive containment cooling system actuation
- Containment hydrogen - for containment hydrogen ignitor actuation
- Steam generator water level - for overfill prevention by manual actuation of the automatic depressurization system valves.



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DCP/NRC1413
NSD-NRC-98-5757
Docket No.: 52-003

August 14, 1998

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: T. R. Quay

SUBJECT: RESPONSE TO NRC LETTERS CONCERNING REQUEST FOR WITHHOLDING
INFORMATION

- Reference:
1. Letter, Sebrosky to McIntyre, "Request for withholding information from public disclosure for Westinghouse AP600 design letter of October 20, 1993," dated June 18, 1998.
 2. Letter, Sebrosky to McIntyre, "Request for withholding information from public disclosure for Westinghouse AP600 design letter of January 17, 1994," dated June 18, 1998.
 3. Letter, Sebrosky to McIntyre, "Request for withholding information from public disclosure for Westinghouse AP600 letters of September 20, 1993, January 21, 1994, and February 3, 1994," dated July 10, 1998.
 4. Letter, Sebrosky to McIntyre, "Request for withholding proprietary information for Westinghouse letters dated April 18, 1995," dated July 15, 1998.
 5. Letter, Huffman to McIntyre, "Request for withholding information from public disclosure of Westinghouse report on AP600 function based task analysis," dated July 17, 1998.

Dear Mr. Quay:

Reference 1 provided the NRC assessment of the Westinghouse claim that proprietary information was provided in a letter dated October 20, 1993, that contained the response to a staff request for additional information regarding the AP600 probabilistic risk assessment. The NRC assessment was that the material was similar to material that exists in the current (1998) nonproprietary version of the AP600 probabilistic risk assessment (PRA) report. In addition, the staff indicated the material was used by the staff in the development of the AP600 draft safety evaluation report and therefore should remain on the docket. At the time this request for additional information response was provided to the

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Enclosure 2

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NRC technical staff, the information was considered to be proprietary by Westinghouse since it contained information that had commercial value to Westinghouse. If this request for additional information response was indeed used by the staff in development of the AP600 draft final safety evaluation report in November 30, 1994, then at this time, almost five years later, this information is no longer considered to be proprietary by Westinghouse.

Reference 2 provided the NRC assessment of the Westinghouse claim that proprietary information was provided in a letter dated January 17, 1994, that contained the response to a staff request for additional information regarding the AP600 instrumentation and control system. The NRC assessment was that the material was similar to material that exists in the current (1998) nonproprietary version of the AP600 standard safety analysis report. In addition, the staff indicated the material was used by the staff in the development of the AP600 draft safety evaluation report and therefore should remain on the docket. At the time this request for additional information response was provided to the NRC technical staff, the information was considered to be proprietary by Westinghouse since it contained information that had commercial value to Westinghouse. If this request for additional information response was indeed used by the staff in development of the AP600 draft final safety evaluation report in November 30, 1994, then at this time, over four years later, this information is no longer considered to be proprietary by Westinghouse.

Reference 3 provided the NRC assessment of the Westinghouse claim that proprietary information was provided in a letter dated September 20, 1993, that contained information related to the AP600 PRA and WCAP-13795, which provided the PRA uncertainty analysis. The NRC assessment was that the material was similar to material that exists in the current (1998) nonproprietary version of the AP600 probabilistic risk assessment (PRA) report. In addition, the staff indicated the material was used by the staff in the development of the AP600 draft safety evaluation report and therefore should remain on the docket. At the time this information was provided to the NRC technical staff, it was considered to be proprietary by Westinghouse since it contained information that had commercial value to Westinghouse. If the information transmitted by the Westinghouse September 20, 1993, letter was indeed used by the staff in development of the AP600 draft final safety evaluation report in November 30, 1994, then at this time, almost five years later, this information is no longer considered to be proprietary by Westinghouse.

Reference 3 also provided the NRC assessment of the Westinghouse claim that proprietary information was provided in a letter dated January 21, 1994, that contained WCAP-13913, "Framework for AP600 Severe Accident Management Guidance" (SAMG). The NRC assessment was that the material was similar to material that exists in current (1998) nonproprietary AP600 documents (e.g., WCAP-13914, "Framework for AP600 Severe Accident Management Guidance"). In addition, the staff indicated the material was used by the staff in the development of the AP600 draft safety evaluation report and therefore should remain on the docket. At the time this Framework for SAMG was provided to the NRC technical staff, the information was considered to be proprietary by Westinghouse since it contained information that had commercial value to Westinghouse. At this time, over four years later, this information is no longer considered to be proprietary by Westinghouse.

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Reference 3 also provided the NRC assessment of the Westinghouse claim that proprietary information was provided in a letter dated February 3, 1994, that contained additional copies of WCAP-13913, "Framework for AP600 Severe Accident Management Guidance" (SAMG). The NRC assessment was that the material was similar to material that exists in current (1998) nonproprietary AP600 documents (e.g., WCAP-13914, "Framework for AP600 Severe Accident Management Guidance"). In addition, the staff indicated the material was used by the staff in the development of the AP600 draft safety evaluation report and therefore should remain on the docket. At the time this Framework for SAMG was provided to the NRC technical staff, the information was considered to be proprietary by Westinghouse since it contained information that had commercial value to Westinghouse. At this time, over four years later, this information is no longer considered to be proprietary by Westinghouse.

Reference 4 provided the NRC assessment of the Westinghouse claim that proprietary information was provided in a letter dated April 18, 1995, that contained information for a MAAP4/RELAP comparison for the AP600 in response to a staff request for additional information. The NRC assessment was that the Westinghouse cover letter indicated that Enclosure 2 is a non-proprietary version of Enclosure 3, however, the staff could not find any portion of the enclosures marked as proprietary. The staff assessment further states the conventional bracketed-superscript notation also appears to be missing. Finally, the NRC assessment states the staff could not determine which part of the material enclosed with the Westinghouse letter was Enclosure 1, 2, or 3. It should be noted that the Westinghouse April 18, 1995, cover letter states "Enclosures 2 (nonproprietary) and 3 (proprietary) provide the requested information." The letter does not indicate that enclosure 2 was a duplicate of enclosure 3 minus the proprietary information. A cover sheet was provided just prior to each of the enclosures to the Westinghouse letter. The enclosures contained the following: Enclosure 1 provided a copy of the NRC's two-page request for information for the MAAP-RELAP comparison. Enclosure 2 provided the requested information, and was titled "Requested Information for AP600 MAAP4/RELAP Comparison." Under section 4, Initial Conditions, of Enclosure 2 it states the initial conditions information (which was proprietary) is provided in Enclosure 3 of the subject Westinghouse letter. Finally, Enclosure 3 contained the list of initial conditions. The information provided in Enclosure 3 was labeled as Westinghouse Proprietary Class 2 at the top of the page, however, the specific proprietary information was not indicated by the bracketed-superscripted notation. In addition to the initial conditions, a mark-up of AP600 PRA Figure K-1 was provided in Enclosure 3. Again, the information was labeled as Westinghouse Proprietary Class 2 at the top of the page, however, the specific proprietary information was not indicated by the bracketed-superscripted notation. At the time the information provided in Enclosure 3 of the subject Westinghouse letter was provided to the NRC technical staff, the information was considered to be proprietary by Westinghouse since it contained information that had commercial value to Westinghouse. At this time, over three years later, this information is no longer considered to be proprietary by Westinghouse.

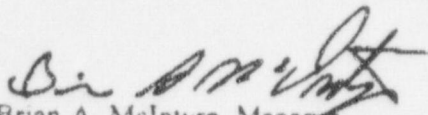
Reference 5 provided the NRC assessment of the Westinghouse claim that proprietary information was provided in a letter dated February 8, 1994, provided a copy of WCAP-13957, "AP600 Reactor Coolant System Mass Inventory: Function Based Risk Analysis." The NRC assessment was that the material was not "information that the staff customarily accepts as proprietary." In addition, the staff indicated the material was used by the staff in the development of the AP600 final safety evaluation report and therefore should remain on the docket. At the time this report was prepared, the

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information was considered to be proprietary by Westinghouse since it contained information that had commercial value to Westinghouse and was of the type of information that was customarily held in confidence by Westinghouse. That the material was not information that the staff customarily accepts as proprietary is not relevant to making the proprietary determination. However, in an effort to expedite the issuance of the AP600 Final Safety Evaluation Report and Final Design Approval, Westinghouse agrees to no longer consider this information to be proprietary.

In a telephone call on July 8, 1998, the staff informed Westinghouse of a concern related to WCAP-13288 and WCAP-13289, which were associated with the AP600 check valve testing specification. The concern was that the proprietary report had no proprietary information identified and the nonproprietary report had been placed in the public document room. Westinghouse has reviewed these reports and, at this time, considers none of the information to be proprietary.

This response addresses the proprietary issues delineated in the references.



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jml

cc: J. W. Roe - NRC/NRR/DRPM
J. M. Sebrosky - NRC/NRR/DRPM
W. C. Huffman - NRC/NRR/DRPM
H. A. Sepp - Westinghouse