



Westinghouse Electric Company
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Your ref: Docket No. 71-9297
Our ref: LTR-LCPT-20-13

June 22, 2020

Subject: Supplement Submittal for Amendment Request Application USA/9297/AF-96 for Model No. Traveller STD, XL, and VVER Packages

Reference: (1) LTR-LCPT-20-06, Amendment Request Application USA/9297/AF-96 for Model No. Traveller STD, XL, and VVER Packages, Westinghouse Electric Co., LLC, dated April 6, 2020.

Dear Director,

Westinghouse is submitting change pages as defined below to supplement the amendment application request for the Traveller package license, USA/9297/AF-96 (Reference 1). Change pages incorporate recommendation for clarification in the safety analysis report (SAR) Revision 15 based on the NRC staff review. The change pages are updated within the SAR files submitted herein. A proprietary and non-proprietary version are enclosed; however, the change pages do not impact any proprietary content or markings.

Change pages:

- SAR Section 2.12.9 (page 2-245, paragraph under Table 2-61) – added statement:
The thin chromium coating remains mechanically stable at temperatures at or above -40°F (- 40°C) when plated onto the base zirconium alloy.
- SAR Section 3.3.1.1 (page 3-5B, first paragraph) – clarified the component name (Outerpack moderator cover):
Traveller VVER model's predicted the Outerpack moderator cover maximum temperature of 108°C (versus 106°C for Traveller XL)...
- List of Effective Pages (page xiii) – updated page 3-5B as revision 15, dated 3/2020

This submittal contains proprietary information of Westinghouse Electric Company LLC (“Westinghouse”). In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Nuclear Regulatory Commission’s (“Commission’s”) regulations, we are enclosing with this submittal an Affidavit. The Affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission.

Correspondence with respect to the proprietary aspects of the submittal or the Westinghouse Affidavit should reference AW-20-5061 and should be addressed to Wes Stilwell, Nuclear Fuel Transport Director,

Westinghouse Electric Company, Columbia Fuel Fabrication Facility, 5801 Bluff Road, Hopkins, SC 29061.

One copy of the supplement application is submitted electronically via NRC Electronic Information Exchange (EIE) system and one is emailed to the Project Manager, Pierre Saverot. Additional electronic or hard copy submissions are available upon request. If you have any questions, or require additional information, please contact me. Thank you for your review time.

Best regards,

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Tanya Sloma-DeLosier
Package Licensing Program Manager
Licensing, Compliance, and Package Technology
Westinghouse Electric Company LLC

Enclosures:

Non-Proprietary Enclosure:

1. AW-20-5061, Affidavit
2. LTR-LCPT-20-13-NP Attachment
Safety Analysis Report Revision 15 Application for Certificate of Compliance for the Traveller PWR Fuel Shipping Package, NRC Certificate of Compliance USA/9297/AF-96
(SAR Revision 15, dated March 2020)

Proprietary Enclosures:

1. LTR-LCPT-20-13-P Attachment
Safety Analysis Report Revision 15 Application for Certificate of Compliance for the Traveller PWR Fuel Shipping Package, NRC Certificate of Compliance USA/9297/AF-96
(SAR Revision 15, dated March 2020)

cc:

T. Grange, Westinghouse-UK
W. Stilwell, Westinghouse-USA
P. Saverot, US NRC

AFFIDAVIT

STATE OF SOUTH CAROLINA:

COUNTY OF RICHLAND:

- (1) I, William E. Stilwell, have been specifically delegated and authorized to apply for withholding and execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse).
- (2) I am requesting the proprietary portions of LTR-LCPT-20-13 be withheld from public disclosure under 10 CFR 2.390.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged, or as confidential commercial or financial information.
- (4) Pursuant to 10 CFR 2.390, 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 and is not customarily disclosed to the public.
 - (ii) Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

AFFIDAVIT

- (5) Westinghouse has policies in place to identify proprietary information. 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.
- (6) The attached submittal contains proprietary information throughout, for the reasons set forth in Sections 5 (a), (b), (c) of this Affidavit. Accordingly, a redacted version would be of no value to the public.

AFFIDAVIT

I declare that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6-22-2020

A handwritten signature in blue ink, appearing to read "Wes Stilwell", is written over a horizontal line.

William E. (Wes) Stilwell, Director
Nuclear Fuel Transport