

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
NRC 2020-0032 Enclosure 2

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to**

10 CFR 2.390

(12 Attachments)

(51 Total Pages, including cover sheets)

Enclosure 2 Document List

Attachment 1 – CAW-20-5109, Affidavit for Westinghouse proprietary portions of Point Beach Nuclear Plant Units 1 and 2 Subsequent License Renewal Application (SLRA) Table 4.3.4-1 Sentinel Locations, dated October 30, 2020 (Enclosure 5 Attachment 1)

Attachment 2 – CAW-20-5091, Affidavit for Westinghouse proprietary portions of WCAP-18554-P Revision 1, dated September 16, 2020 (Enclosure 5 Attachment 2)

Attachment 3 – Framatome Affidavit dated November 4, 2020 for proprietary information contained in the following reports:

- Framatome Topical Report BAW-2192, Revision 0, Supplement 3P, Revision 0, “Low Upper-Shelf Toughness Fracture Mechanics Analysis of Reactor Vessels of B&W Owners Reactor Vessel Working Group for Levels A & B Service Loads,” October 2020 (Enclosure 5, Attachment 3),
- Framatome Topical Report BAW-2178, Revision 0, Supplement 2P, Revision 0, “Low Upper-Shelf Toughness Fracture Mechanics Analysis of Reactor Vessels of B&W Owners Reactor Vessel Working Group for Levels C & D Service Loads,” October 2020 (Enclosure 5, Attachment 4), and
- Framatome Technical Report ANP-3886P, Revision 0, PWROG-20043-P, “PWROG – PBN Unit 1 IS Plate A9811-1 Equivalent Margins Analysis for SLR,” October 2020 (Enclosure 5, Attachment 5)

Attachment 4 – CAW-20-5065, Affidavit for Westinghouse proprietary portions of LTR-SDA-II-20-05-P, Rev. 2, dated July 7, 2020 (Enclosure 5 Attachment 6)

Attachment 5 – CAW-20-5071, Affidavit for Westinghouse proprietary portions of LTR-SDA-II-20-08-P, Rev. 1, dated July 20, 2020 (Enclosure 5 Attachment 7)

Attachment 6 – CAW-20-5101, Affidavit for Westinghouse proprietary portions of LTR-SDA-II-20-13-P, Rev. 2, dated September 29, 2020 (Enclosure 5 Attachment 8)

Attachment 7 – CAW-20-5110, Affidavit for Westinghouse proprietary portions of File No.: 2000088.310P – PROPRIETARY, Revision 1, EAF Refined Analyses (Charging Nozzle, Hot Leg Surge Nozzle, SI Nozzle, SI/RHR Tee), dated November 3, 2020 (Enclosure 5 Attachment 9)

Attachment 8 – CAW-20-5102, Affidavit for Westinghouse proprietary portions of LTR-SDA-20-064-P, Rev. 1, dated October 7, 2020 (Enclosure 5 Attachment 10)

Attachment 9 – CAW-20-5057, Affidavit for Westinghouse proprietary portions of WCAP-14439-P, Revision 4, dated June 12, 2020 (Enclosure 5 Attachment 11)

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Attachment 10 – CAW-20-5073, Affidavit for Westinghouse proprietary portions of LTR-PAFM-05-58-P, Rev. 3, dated July 23, 2020 (Enclosure 5 Attachment 12)

Attachment 11 – CAW-20-5067, Affidavit for Westinghouse proprietary portions of LTR-SDA-20-020-P, Rev. 1, dated July 9, 2020 (Enclosure 5 Attachment 13)

Attachment 12 – CAW-20-5066, Affidavit for Westinghouse proprietary portions of LTR-REA-20-29-P, Rev. 0, dated July 8, 2020 (Enclosure 5 Attachment 14)

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Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 1

**CAW-20-5109, Affidavit for Westinghouse proprietary
portions of Point Beach Nuclear Plant Units 1 and 2
Subsequent License Renewal Application (SLRA)
Table 4.3.4-1 Sentinel Locations, dated October 30,
2020 (Enclosure 5 Attachment 1)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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-SDA-II-20-18, Rev. 2 and Point Beach Nuclear Plant Units 1 and 2 Subsequent License Renewal Application (SLRA) Table 4.3.4-1 *Sentinel Locations* 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 documents are bracketed and marked to indicate the bases for withholding. The justification for withholding is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These

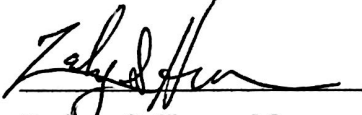
AFFIDAVIT

lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this 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: 10/30/2020


Zachary S. Harper, Manager
Licensing Engineering

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
NRC 2020-0032 Enclosure 2, Attachment 2

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 2

**CAW-50-5091, Affidavit for Westinghouse proprietary
portions of WCAP-18554-P Revision 1, dated
September 16, 2020 (Enclosure 5 Attachment 2)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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 WCAP-18554-P Revision 1 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 documents are bracketed and marked to indicate the bases for withholding. The justification for withholding is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These


AFFIDAVIT

lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this 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: 9/16/2020


Zachary S. Harper, Manager
Licensing Engineering

Enclosure 2

Affidavits Supporting Withholding Proprietary Information from Public Disclosure Pursuant to

10 CFR 2.390

Attachment 3

Framatome Affidavit dated November 4, 2020 for proprietary information contained in the following reports:

- **Framatome Topical Report BAW-2192, Revision 0, Supplement 3P, Revision 0, “Low Upper-Shelf Toughness Fracture Mechanics Analysis of Reactor Vessels of B&W Owners Reactor Vessel Working Group for Levels A & B Service Loads,” October 2020 (Enclosure 5, Attachment 3),**
- **Framatome Topical Report BAW-2178, Revision 0, Supplement 2P, Revision 0, “Low Upper-Shelf Toughness Fracture Mechanics Analysis of Reactor Vessels of B&W Owners Reactor Vessel Working Group for Levels C & D Service Loads,” October 2020 (Enclosure 5, Attachment 4), and**
- **Framatome Technical Report ANP-3886P, Revision 0, PWROG-20043-P, “PWROG – PBN Unit 1 IS Plate A9811-1 Equivalent Margins Analysis for SLR,” October 2020 (Enclosure 5, Attachment 5)**

(4 Total Pages, including cover sheets)

A F F I D A V I T

1. My name is Philip A. Opsal. I am Manager, Product Licensing for Framatome Inc. (formally known as AREVA Inc.), and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by Framatome to determine whether certain Framatome information is proprietary. I am familiar with the policies established by Framatome to ensure the proper application of these criteria.

3. I am familiar with the Framatome information contained in the following Reports referred to herein as "Documents.":

- Framatome Topical Report BAW-2192, Revision 0, Supplement 3P, Revision 0, "Low Upper-Shelf Toughness Fracture Mechanics Analysis of Reactor Vessels of B&W Owners Reactor Vessel Working Group for Levels A & B Service Loads," October 2020,
- Framatome Topical Report BAW-2178, Revision 0, Supplement 2P, Revision 0, "Low Upper-Shelf Toughness Fracture Mechanics Analysis of Reactor Vessels of B&W Owners Reactor Vessel Working Group for Levels C & D Service Loads," October 2020,
- Framatome Technical Report ANP-3886P, Revision 0, PWROG-20043-P, "PWROG – PBN Unit 1 IS Plate A9811-1 Equivalent Margins Analysis for SLR," October 2020.

Information contained in these Documents has been classified by Framatome as proprietary in accordance with the policies established by Framatome for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by Framatome and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by Framatome to determine whether information should be classified as proprietary:

- (a) The information reveals details of Framatome's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for Framatome.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Framatome.

The information in these Documents is considered proprietary for the reasons set forth in paragraphs 6(b), 6 (c), 6(d) and 6(e) above.

7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Framatome policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements 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 November 4, 2020.

A handwritten signature in black ink, appearing to read "Philip A. Opsal", written over a horizontal line.

Philip A. Opsal

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
NRC 2020-0032 Enclosure 2, Attachment 4

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 4

**CAW-50-5065, Affidavit for Westinghouse proprietary
portions of LTR-SDA-II-20-05-P, Rev. 2, dated July 7,
2020 (Enclosure 5 Attachment 6)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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-SDA-II-20-05-P, Rev. 2 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.
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 - (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:
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- (6) The attached documents are bracketed and marked to indicate the bases for withholding. The justification for withholding is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These

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lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this 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: 07/07/2020



Zachary S. Harper, Manager

Licensing Engineering

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
NRC 2020-0032 Enclosure 2, Attachment 5

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 5

**CAW-50-5071, Affidavit for Westinghouse proprietary
portions of LTR-SDA-II-20-08-P, Rev. 1, dated July 20,
2020 (Enclosure 5 Attachment 7)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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-SDA-II-20-08-P, Rev. 1 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.
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AFFIDAVIT

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AFFIDAVIT

lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this 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: 7/20/2020



Zachary S. Harper, Manager
Licensing Engineering

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 6

**CAW-50-5101, Affidavit for Westinghouse proprietary
portions of LTR-SDA-II-20-13-P, Rev. 2, dated
September 29, 2020 (Enclosure 5 Attachment 8)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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-SDA-II-20-13-P, Rev. 2 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.

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- (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:
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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: 9/29/2020


Zachary S. Harper, Manager
Licensing Engineering

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to**

10 CFR 2.390

Attachment 7

CAW-50-5110, Affidavit for Westinghouse proprietary portions of File No.: 2000088.310P – PROPRIETARY, EAF Refined Analyses (Charging Nozzle, Hot Leg Surge Nozzle, SI Nozzle, SI/RHR Tee), dated November 3, 2020 (Enclosure 5 Attachment 9)

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Korey L. Hosack, 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 File No.: 2000088.310P – PROPRIETARY, Revision 1, EAF Refined Analyses (Charging Nozzle, Hot Leg Surge Nozzle, SI Nozzle, SI/RHR Tee) 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.
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 - (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.
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 - (f) It contains patentable ideas, for which patent protection may be desirable.
- (6) The attached document is bracketed to indicate the information requested for withholding. The justification for withholding information in each bracket is set forth in Sections (5)(a) through (c) of this Affidavit.

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: 2020 11 03

A handwritten signature in black ink, appearing to be 'K. Hosack', written over a horizontal line.

Korey L. Hosack, Manager
Licensing, Analysis, & Testing

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
NRC 2020-0032 Enclosure 2, Attachment 8

Enclosure 2

**Affidavits Supporting Withholding Proprietary
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10 CFR 2.390**

Attachment 8

**CAW-50-5102, Affidavit for Westinghouse proprietary
portions of LTR-SDA-20-064-P, Rev. 1, dated October
7, 2020 (Enclosure 5 Attachment 10)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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-SDA-20-064-P, Rev. 1 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 documents are bracketed and marked to indicate the bases for withholding. The justification for withholding is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These

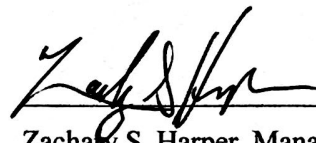
AFFIDAVIT

lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this 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: 10/7/2020



Zachary S. Harper, Manager
Licensing Engineering

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
NRC 2020-0032 Enclosure 2, Attachment 9

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 9

**CAW-50-5057, Affidavit for Westinghouse proprietary
portions of WCAP-14439-P, Revision 4, dated June
12, 2020 (Enclosure 5 Attachment 11)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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 WCAP-14439-P, Revision 4 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 documents are bracketed and marked to indicate the bases for withholding. The justification for withholding is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These

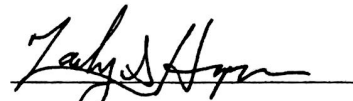
AFFIDAVIT

lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this 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: 6/12/2020


Zachary S. Harper, Manager
Licensing Engineering

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
NRC 2020-0032 Enclosure 2, Attachment 10

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 10

**CAW-50-5073, Affidavit for Westinghouse proprietary
portions of LTR-PAFM-05-58-P, Rev. 3, dated July 23,
2020 (Enclosure 5 Attachment 12)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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-PAFM-05-58-P, Rev. 3 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 documents are bracketed and marked to indicate the bases for withholding. The justification for withholding is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These


AFFIDAVIT

lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this 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: 7/23/2020


Zachary S. Harper, Manager
Licensing Engineering

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 11

**CAW-50-5067, Affidavit for Westinghouse proprietary
portions of LTR-SDA-20-020-P, Rev. 1, dated July 9,
2020 (Enclosure 5 Attachment 13)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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-SDA-20-020-P, Rev. 1 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

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- (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.
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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: 07/09/2020



Zachary S. Harper, Manager
Licensing Engineering

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
NRC 2020-0032 Enclosure 5, Attachment 14

Enclosure 2

**Affidavits Supporting Withholding Proprietary
Information from Public Disclosure Pursuant to
10 CFR 2.390**

Attachment 12

**CAW-50-5066, Affidavit for Westinghouse proprietary
portions of LTR-REA-20-29-P, Rev. 0, dated July 8,
2020 (Enclosure 5 Attachment 14)**

(4 Total Pages, including cover sheets)

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF BUTLER:

- (1) I, Zachary S. Harper, 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-REA-20-29-P, Rev. 0 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

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- (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.
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AFFIDAVIT

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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: 07/08/2020


Zachary S. Harper, Manager
Licensing Engineering