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Your ref: Docket No. 71-9380
Our ref: LTR-LCPT-22-03

March 11, 2022

Subject: Supplement for Amendment Request Application for USA/9380/B(U)F-96 for Model No. Traveller STD and XL Packages

Reference: LTR-LCPT-21-11, Amendment Request Application for USA/9380/B(U)F-96 for Model No. Traveller STD and XL Packages, dated August 2, 2021

Dear Director,

An application is hereby submitted to supplement amendment request of the license USA/9380/B(U)F-96 for Model No. Traveller STD and XL Packages (Reference 1). Supplement content includes 1) revised drawing 10071E36 and associated SAR sections for changes to the two-tier bottom support spacer as documented in proprietary Enclosure 1 - Attachment B and 2) incorporation of comments from NRC review meeting held 9-February 2022, as documented in proprietary Enclosure 2 - Attachment C.

The changes to the license application are documented in Revision 2A of the Safety Analysis Report (SAR). SAR changes are marked as Revision 2A, 03/2022 in the page header. All changes from Revision 2 and 2A are marked in the margin by change bars, even on the same page, to maintain clarification of the amendment contents. Changes are also noted in the application *Record of Revisions* and *List of Effective Pages*. The revised SAR Revision 2A is provided as non-public, proprietary Enclosure 3 and public, non-proprietary Enclosure 3. A complete detailed list of changes is documented in non-proprietary Enclosure 2 – Attachment A. Enclosures of this letter include non-proprietary, redacted documents and proprietary documents. In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Nuclear Regulatory Commission's regulations, we are enclosing with this submittal an Application for Withholding Proprietary Information from Public Disclosure and an Affidavit, AW-22-013 (enclosed as non-proprietary Enclosure 1). The affidavit sets forth the basis on which the information identified as proprietary may be withheld from public disclosure by the Commission.

Request

In addition to the amendment request contents of Reference 1 and as part of this consolidated SAR supplement, per 10 CFR 71.38 Westinghouse requests a five-year renewal to be included in this amendment, extending the expiration to 2027.

Finally, it is requested that changes associated with Revision 1 of the certificate, and associated SAR Rev. 2 and 2A included in this application, be reviewed for the Joint United States – Canada process for package approval and validation, in accordance with NUREG-1886.

Westinghouse has a quality assurance program, approved by the Commission that satisfies the provisions of Subpart H (Quality Assurance) of Part 71. Further, Westinghouse complies with the terms and conditions of the applicable requirements of Subparts A (General Provisions), G (Operating Controls and Procedures), and H (Quality Assurance) of Part 71.

Correspondence with respect to the proprietary aspects of the submittal or the Westinghouse Affidavit should reference AW-22-013 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 amendment application is submitted electronically via NRC Electronic Information Exchange (EIE) system and emailed to the Project Manager, Pierre Saverot. Additional electronic or hard copy submissions are available upon request. Should you have any questions, or require additional information, regarding the 71-9380 amendment application we are here to assist.

Best regards,

*

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

cc:

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

*Electronically approved records are authenticated in the electronic document management system.

Enclosures:

Non-Proprietary Enclosure:

1. AW-22-013, Affidavit
2. LTR-LCPT-21-03 Appendix A - Detailed List of SAR Revision 2A Changes
3. LTR-LCPT-22-03-NP_public Attachment
Safety Analysis Report Revision 2A, Application for Certificate of Compliance for the Traveller
PWR Fuel Shipping Package, NRC Certificate of Compliance USA/9380/B(U)F-96
(SAR Revision 2A, dated March 2022)

Proprietary Enclosures:

1. LTR-LCPT-22-03 Appendix B - Additional Supplement for Revision of Drawing 10071E36, Sheet 7,
Two-Tier Bottom Support Spacer (proprietary version only included)
2. LTR-LCPT-22-03 Appendix C - 9 February 2022 Meeting - Response for Issues (proprietary version
only included)
3. LTR-LCPT-22-03-P_non-public Attachment
Safety Analysis Report Revision 2A, Application for Certificate of Compliance for the Traveller
PWR Fuel Shipping Package, NRC Certificate of Compliance USA/9380/B(U)F-96
(SAR Revision 2A, dated March 2022)

State of South Carolina:

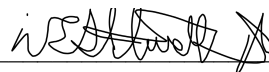
County of Richland:

- (1) I, Wes Stilwell, Director, NF Transport, 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-22-03 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) The information sought to be withheld is being transmitted to the Commission in confidence and, to Westinghouse's knowledge, is not available in public sources.
 - (iii) Westinghouse notes that a showing of substantial harm is no longer an applicable criterion for analyzing whether a document should be withheld from public disclosure. Nevertheless, 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.

- (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 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: 3/15/2022



Signed electronically by
Wes Stilwell

Appendix A – Detailed List of SAR Revision 2A Changes

CHAPTER 1

1. Section 1.2.2.1.1 (page 1-17), 2nd paragraph: clarified ‘The packaging does not maintain a pressure boundary.’
2. Section 1.2.2.1.1 (page 1-17), 2nd paragraph: clarified ‘zirconium based’ cladding may include chromium coating and/or OZL.
3. Section 1.3.2, Traveller Type B Design (RTP) – Licensing Drawings, 10071E36, Rev. 4 (Sheets 1-9)
4. Drawing 10071E36 sheet 7 updates to Bottom Support Spacer Assembly (Skirted Nozzle) as defined in Appendix B

CHAPTER 2

1. Section 2.2.1.8 (page 2-19), clarified ‘zirconium based’ cladding may include chromium coating and/or OZL.
2. Section 2.2.1.8, 3rd paragraph added to clarify the conclusions of allowing chromium-coating and OZL on any zirconium base cladding. (Issue 1 resolution)
3. Section 2.2.1.8, Tables 2.2-5, 2.2-6 and 2.2-7, clarified Aluminum 5052 alloy and stainless steel 300 series
4. Section 2.2.1.8.1, last paragraph (page 2-24): revised text to clarify, the difference of Type A and Type B content and thus testing define the potential failure mechanism of the cladding (Issue 4 resolution)
5. Section 2.2.1.8.2 and 2.2.1.8.3, clarified zirconium base cladding (Issue 1 resolution)
6. Section 2.2.1.8.3, added text regarding the coated cladding manufacturing process quality control (Issue 5 resolution)
7. Section 2.2.1.8.4, clarified Aluminum 5052 alloy for cladding and corrected calculation result (Issue 2 resolution)
8. Section 2.2.1.8.4, clarified stainless steel 300 series for cladding
9. Section 2.2.1.8.4, sub-section added for ‘Non-Weld Bonded End Plugs’ (Issue 3 resolution); Note: additional information provided beyond resolution response.
10. Page 2-36 clarified Aluminum 5052 alloy and Austenitic stainless steel
11. Section 2.12.4.3 added text for voided region, as further discussed in Appendix B
12. Section 2.12.4.5, 2nd paragraph, last sentence, corrected figure references. (Maintained as Rev. 2 change)

CHAPTER 3

1. Section 3.2.1, text above Table 3.2-1 clarified to reference table.
2. Section 3.2.1.1, first sentence removed regarding in-reactor performance (Issue 1 resolution)
3. Section 3.2.1.1, revised text to zirconium base cladding or alloy as needed to align with Section 2.2.1.8 references (Issue 1 resolution)
4. Section 3.2.1.1, subheading *Stainless Steel and Aluminum Cladding*: added last two paragraphs for bonding thermal performance (Issue 2 resolution)

CHAPTER 4 - 8

No changes