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Your ref: Docket No. 71-9380  
Our ref: LTR-LCPT-23-01

January 20, 2023

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

Dear Director,

Westinghouse herein submits a request amendment of the license USA/9380/B(U)F-96 for Model No. Traveller STD and XL Packages. This amendment is submitted to amend the SAR to correct a typographical error in the license drawings of the top axial restraint component materials. Components have been designed and fabricated to the correct material requirements, as designed and tested shown compliant to regulatory requirements as previously reviewed by NRC staff. The drawing materials are a typographical error, and there is no change in the design or safety performance of the package.

To meet a first of a kind accident tolerant fuel (ATF), high enrichment lead test assembly (LTA) delivery from Westinghouse UK fuel fabrication facility to the US NPP in July 2023, Westinghouse requests an expedited amendment approval of the NRC by March 1, 2023 to allow for subsequent expedited Competent Authority amendment approvals.

The changes to the license application are documented in Revision 3 of the Safety Analysis Report (SAR), marked as Revision 3, 01/2023 in the page header. Changes are also noted in the application *Record of Revisions* and *List of Effective Pages*. The revised SAR Revision 3 is provided as non-public, proprietary Enclosure 3 and public, non-proprietary Enclosure 2.

71-9380 SAR revision 3 changes:

- Traveller XL and STD Drawing 10004E58 update to Revision 10 - Sheet 1 Bill of Material (BOM) requires an update for Item 137, *RUBBER PAD*, material change “304 STAINLESS STEEL” to “RUBBER”
  - The rubber pad part is in addition to the stainless steel part that is identified in separate BOM items.
- Traveller XL and STD Type B Drawing 10071E36 update to Revision 5 - Sheet 1 BOM requires an update for Item 133, *TOP AXIAL RESTRAINT*, material change “ASTM B209/B221 6061-T6 ALUMINUM” to “300 SERIES STAINLESS STEEL”
  - The top axial restraint component is correctly identified, as designed and tested, in SAR Section 2.7.1.4.1, *Type B Full Scale Drop Test Sequence*, as “300 SERIES STAINLESS STEEL”.

- 71-9380 SAR Rev 3, Chapter 1 – Revise Table 1-3, *Safety-Related Parts for Traveller Type A Configuration (Drawing 10004E58)*, to correct Item 137 material change “304 STAINLESS STEEL” to “RUBBER”
- 71-9380 SAR Rev 3, Chapter 1 – Revise Table 1-4, *Safety-Related Parts for Traveller Type B Configuration (Drawing 10071E36)*, to correct Item 133 material change “ASTM B209/B221 6061-T6 ALUMINUM” to “300 SERIES STAINLESS STEEL”

Request

Westinghouse requests an expedited amendment approval by March 1, 2023 to meet the LTA delivery schedule. In addition, it is requested that changes are 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.

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-23-002 (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. Correspondence with respect to the proprietary aspects of the submittal or the Westinghouse Affidavit should reference AW-23-002 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

Enclosures:

**Non-Proprietary Enclosure:**

1. AW-23-002, Affidavit
2. LTR-LCPT-23-01-NP\_public Attachment  
Safety Analysis Report Revision 3, Application for Certificate of Compliance for the Traveller PWR  
Fuel Shipping Package, NRC Certificate of Compliance USA/9380/B(U)F-96  
(SAR Revision 3, dated January 2023)

**Proprietary Enclosures:**

3. LTR-LCPT-23-01-P\_non-public Attachment  
Safety Analysis Report Revision 3, Application for Certificate of Compliance for the Traveller PWR  
Fuel Shipping Package, NRC Certificate of Compliance USA/9380/B(U)F-96  
(SAR Revision 3, dated January 2023)

State of South Carolina:

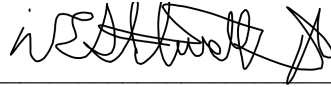
County of Richland:

- (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-23-01 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: 1/19/2023

A handwritten signature in black ink, appearing to read 'Wes Stilwell', written over a horizontal line.

Signed electronically by  
Wes Stilwell