

**ATTACHMENT 1 TRANSMITTED HERewith CONTAINS PROPRIETARY
INFORMATION – WITHHOLD UNDER 10 CFR 2.390**

10 CFR 50.90

February 15, 2023

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Document Control Desk

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Supplement to License Amendment Request to Revise the Licensing and Design Basis to Incorporate the Replacement of Existing Safety-Related Analog Control Systems with a Single Digital Plant Protection System (PPS)- System Design Specification Revision 3

- References:
1. Constellation Energy Generation, LLC (CEG) letter to the U.S. Nuclear Regulatory Commission (NRC), "License Amendment Request to Revise the Licensing and Design Basis to Incorporate the Replacement of Existing Safety-Related Analog Control Systems with a Single Digital Plant Protection System (PPS)," dated September 26, 2022 (NRC Agencywide Documents Access and Management System (ADAMS) Accession No. ML22269A5690).
 2. U.S. Nuclear Regulatory Commission (NRC) letter to Constellation Energy Generation, LLC (CEG), "Limerick Generation Station, Unit Nos. 1 and 2 – Acceptance of Requested Licensing Action Re: Replacement of Existing Safety Related Analog Control Systems with a Single Digital Plant Protection System (EPID L-2022-LLA-0140)," dated December 9, 2022 (ADAMS Accession No. ML22339A064).

In accordance with 10 CFR 50.90, Constellation Energy Generation, LLC (CEG) requested a License Amendment Request (LAR) to replace the Limerick Generating Station, Units 1 and 2 existing safety-related analog control systems with a single digital Plant Protection System (PPS) (Reference 1). NRC accepted the LAR for review on December 9, 2022 (Reference 2).

**ATTACHMENT 1 TRANSMITTED HERewith CONTAINS PROPRIETARY
INFORMATION – WITHHOLD UNDER 10 CFR 2.390. When separated from
Attachment 1, the cover letter is decontrolled.**

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In Reference, 1 CEG described supplemental information that needed to be updated later. In Reference 2, NRC acknowledged a schedule for required supplemental information. Accordingly, CEG is providing the System Design Specification Revision 3 in the Attachment 1 to this letter.

The System Design Specification Revision 3 provided in Attachment 1 contains information proprietary to WEC. Attachment 2 includes an affidavit signed by Westinghouse Electric Corporation (WEC), the owner of the proprietary information. The affidavit sets forth the basis upon which the information may be withheld from public disclosure by the NRC, and it addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390 of the NRC's regulations. WEC requests that the WEC proprietary information in Attachment 1 be withheld from public disclosure in accordance with 10 CFR 2.390. Future correspondence with respect to the proprietary aspects of the application for withholding related to the WEC proprietary information or the WEC affidavit provided in Attachment 2 should reference this request letter.

CEG has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in the Reference 1 letter. CEG has concluded that the information provided in this supplemental letter does not affect the bases for concluding that the proposed license amendments do not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92. In addition, CEG has concluded that the information in this supplemental letter does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendments.

This supplemental letter contains no regulatory commitments.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), CEG is notifying the Commonwealth of Pennsylvania of this supplemental letter by transmitting a copy of this letter to the designated State Official.

If you have any questions regarding this submittal, then please contact Frank Mascitelli at Francis.Mascitelli@constellation.com.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of February 2023.

Respectfully,



David P. Helker
Sr. Manager - Licensing
Constellation Energy Generation, LLC

**ATTACHMENT 1 TRANSMITTED HEREWITH CONTAINS PROPRIETARY
INFORMATION – WITHHOLD UNDER 10 CFR 2.390**

Attachment 1: Limerick Generating Station Units 1&2 Digital Modernization Project Plant
Protection System System Design Specification WNA-DS-04900-GLIM,
Rev. 3, dated February 2023

Attachment 2: WEC Affidavit CAW-23-005

cc:	USNRC Region I, Regional Administrator	w/ attachment 1
	USNRC Project Manager, LGS	"
	USNRC Senior Resident Inspector, LGS	"
	Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental Protection	w/o attachment 1

Attachment 1

License Amendment Request Supplement

**Limerick Generating Station, Units 1 and 2
Docket Nos. 50-352 and 50-353**

**Limerick Generating Station Units 1&2
Digital Modernization Project Plant Protection System
System Design Specification WNA-DS-04900-GLIM,
Rev. 3, dated February 2023**

Attachment 2

License Amendment Request Supplement

**Limerick Generating Station, Units 1 and 2
Docket Nos. 50-352 and 50-353**

WEC Affidavit CAW-23-005

Commonwealth of Pennsylvania:

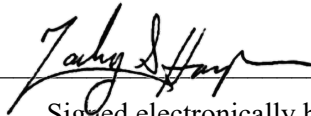
County of Butler:

- (1) I, Zachary Harper, Senior Manager, Licensing Engineering, 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 WNA-DS-04900-GLIM, Revision 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) 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 submittal contains proprietary information throughout, for the reasons set forth in Sections (5) (a) and (c) of this Affidavit. Accordingly, a redacted version would be of no value to the public.

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: 2/14/2023


Signed electronically by
Zachary Harper

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Approval Information

Manager Approval Harper Zachary S Feb-14-2023 11:33:00

Files approved on Feb-14-2023

*** This record was final approved on 2/14/2023, 11:33:00 AM. (This statement was added by the PRIME system upon its validation)