

Enclosure 1 to this Letter Contains Proprietary Information Withhold Enclosure 1 from Public Disclosure in Accordance with 10 CFR 2.390

> June 10, 2024 L-2024-093

- U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001
- RE: Point Beach Nuclear Plant, Units 1 and 2 Docket Nos. 50-266 and 50-301 Renewed Facility Operating Licenses DPR-24 and DPR-27

Point Beach Unit 1 Steam Generator Divider Plate Assemblies Bounding Analysis Evaluation for Aging Management Commitment 14 Revision

References:

- 1. Safety Evaluation Report, Revision 1, "Related to the Subsequent License Renewal of Point Beach Nuclear Plant, Units 1 and 2," May 2022 (ADAMS Accession No. ML22140A127)
- 2. Westinghouse LTR-CECO-21-046, Revision 2, "Subsequent License Renewal Bounding Analysis Evaluation for the Point Beach Unit 1 Steam Generator Divider Plate Assemblies"
- Electric Power and Research Institute (EPRI) Report 3002002850, "Steam Generator Management Program: Investigation of Crack Initiation and Propagation in the Steam Generator Channel Head Assembly," October 2014

NextEra Energy Point Beach, LLC (NextEra) hereby submits this notification of a regulatory commitment change for Point Beach Nuclear Plant (PBNP), Units 1 and 2. Reference 1 documented that the industry analyses in EPRI Report 3002002850 (Reference 3) are assumed to not be bounding for PBNP, Unit 1 steam generators (SGs). As a result, Commitment #14 of Reference 1 included a one-time inspection of the PBNP, Unit 1 SG divider plate assemblies using qualified techniques capable of detecting primary water stress corrosion cracking. In Reference 2, Westinghouse determined that EPRI Report 3002002850 (Reference 3) is bounding for PBNP, Unit 1 SG divider plate assemblies, thereby prompting NextEra to revise Commitment #14 to no longer require the one-time inspection of the SG divider plate assemblies.

Enclosure 1 contains information that Westinghouse Electric Company LLC (Westinghouse) considers to be proprietary in nature. The request is supported by an affidavit signed by Westinghouse, the owner of the information. Pursuant to 10 CFR 2.390(a)(4), NextEra requests the proprietary information be withheld from public disclosure. Enclosure 2 provides a non-proprietary version of the evaluation provided in Enclosure 1. Enclosure 3 provides the Westinghouse affidavit supporting the proprietary withholding request. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Nuclear Regulatory Commission ("Commission") and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations. Accordingly, NextEra requests that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations. Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-24-026 and be addressed to Zachary Harper, Senior Manager, Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 165, Cranberry Township, Pennsylvania, 16066.

NextEra Energy Point Beach, LLC

6610 Nuclear Road, Two Rivers, WI 54241

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Should you have any questions regarding this submission, please contact Mr. Kenneth Mack, Fleet Licensing Senior Manager, at 561-904-3635.

Sincerely,

M

Paul Rasmus General Manager, Regulatory Affairs

Enclosures:

- 1. LTR-CECO-21-046-P, Revision 2, "Subsequent License Renewal Bounding Analysis Evaluation for the Point Beach Unit 1 Steam Generator Divider Plate Assemblies"
- 2. LTR-CECO-21-046-NP, Revision 2, "Subsequent License Renewal Bounding Analysis Evaluation for the Point Beach Unit 1 Steam Generator Divider Plate Assemblies"
- 3. AFFIDAVIT CAW-24-026
- cc: USNRC Regional Administrator, Region III Project Manager, USNRC, Point Beach Nuclear Plant Resident Inspector, USNRC, Point Beach Nuclear Plant Mr. Mike Verhagan, Department of Commerce, State of Wisconsin

Point Beach Nuclear Plant Docket Nos. 50-266; 50-301 L-2024-093 Enclosure

Enclosure 2

LTR-CECO-21-046-NP, Revision 2, "Subsequent License Renewal Bounding Analysis Evaluation for the Point Beach Unit 1 Steam Generator Divider Plate Assemblies"

NON-PROPRIETARY

(9 Pages Follow)

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Westinghouse Electric Company

LTR-CECO-21-046 NP-Attachment Revision 2

Subsequent License Renewal Bounding Analysis Evaluation for the Point Beach Unit 1 Steam Generator Divider Plate Assemblies

May 2024

<u>Author</u>: Michael A. Roth*

Component Engineering & Chemistry Operations

Verifier:

Joshua R. Phillips* Component Engineering & Chemistry Operations

<u>Approved</u>: Monica Copete Montiel*, Acting Manager Component Engineering & Chemistry Operations

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* Electronically Approved Records are Authenticated in the Electronic Document Management System

*** This record was final approved on 05/22/2024 14:57:19. (This statement was added by the PRIME system upon its validation)

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INTRODUCTION/BACKGROUND

Point Beach Unit 1 has a subsequent license renewal (SLR) commitment for steam generators to perform a one-time inspection of the steam generator divider plate assemblies. This document provides a bounding analysis relative to subsequent license renewal for the Point Beach Unit 1 steam generator divider plate assemblies and replaces that plant-specific one-time inspection commitment as allowed by LR-ISG-2016-01 (Reference 2).

LR-ISG-2016-01 (Reference 2), describes changes to the aging management guidance for steam generator components in NUREG-1801 (GALL Report), Revision 2, and NUREG-1800 (SRP-LR), Revision 2, including guidance for managing cracking due to PWSCC in steam generator divider plate assemblies and tube-to-tubesheet welds. Specifically, it revises GALL Report aging management program (AMP) XI.M19, "Steam Generators," and SRP-LR Sections 3.1.2.2.11 and 3.1.3.2.11, "Cracking Due to Primary Water Stress Corrosion Cracking." The revised guidance reflects the NRC Staff's acceptance of the technical conclusions resulting from the EPRI Steam Generator Management Program (SGMP) investigation into the initiation and propagation of cracking in the steam generator channel head components, as documented in several EPRI reports, principally including EPRI 3002002850 (Reference 3).

In parallel with the NRC Staff's finalization of LR-ISG-2016-01, EPRI prepared and issued Information Letter SGMP-IL-16-02, "Changes to Aging Management Guidance for Steam Generator Channel Head Components," (Reference 4). The purpose of SGMP-IL-16-02 is to inform the industry that the NRC LR-ISG-2016-01 accepts the conclusions of the SGMP investigation into the initiation and propagation of cracking in the steam generator channel head components. SGMP-IL-16-02 states that the EPRI 2014 Report (Reference 3) and LR-ISG-2016-01 may be used as a basis for updating aging management programs for Subsequent License Renewal for plants with susceptible materials. Attachment 1 to SGMP-IL-16-02 is a checklist entitled, "Guidance for Addressing Aging Management Plans for Steam Generator Channel Head Components," (EPRI Checklist) that reflects the bounding conditions considered in the EPRI 2014 Report (Reference 3) and other related EPRI technical reports, and which licensees can use to document that the EPRI 2014 report analysis bounds their plants' steam generators.

The EPRI Checklist states that if Alloy 600 or Alloy 600 variations were used in fabricating a plant's steam generator divider plate assemblies or weld materials, then the reviewer should use the checklist to verify that there is an adequate technical basis for concluding that the plant is bounded by the analyses performed in EPRI Technical Reports 3002002850, 1014982 (Reference 5), and 1020988 (Reference 6). If all responses to the EPRI Checklist are "Yes" or other appropriate technical justification is provided, then the plant is bounded by the above referenced EPRI technical reports and can appropriately rely on the aging management guidance in LR-ISG-2016-01.

The Point Beach Unit 1 steam generators have divider plate assemblies fabricated with [

]^{a,c,e} materials. Therefore, the EPRI Checklist is used to show that the pertinent plant-specific attributes are bounded by the EPRI SGMP analyses.

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EVALUATION

EPRI Checklist Evaluation of the Point Beach Unit 1 Divider Plate Assemblies:

1. Divider plate thickness is greater than or equal to 1.9 inches?

Response:

Yes. The Point Beach Unit 1 steam generators have a divider plate thickness that is greater than or equal to 1.9 inches. The thickness is [$]^{a,c,e}$ (References 8 and 13).

2. Channel head wall thickness at the triple point location is greater than or equal to 5.20 inches?

Response:

Yes. The Point Beach Unit 1 steam generators have a channel head thickness at the triple point location that is comparable to the thickness used in the Reference 3 analysis. The channel head thickness varies from [$]^{a,c,e}$ [Reference 9).¹

3. Tubesheet is greater than or equal to 21 inches thick?

Response:

Yes. The Point Beach Unit 1 steam generators have a tubesheet thickness that is greater than or equal to 21 inches thick. The thickness is [$]^{a,c,e}$ (Reference 10).

4. The steam generator that was modeled included a stub runner. The stub runner is a feature important to divider plate alignment during manufacturing. The stub runner facilitates being able to adjust the divider plate position and still make the weld without creating excessive distortion of the divider plate. A stub runner plate 3 inches tall is typical and was used in the analysis. Other designs may or may not use a stub runner. Provide justification that the plant's steam generator design would be bounded by the analysis.

Response:

Yes. The Point Beach Unit 1 steam generators utilize a stub runner design. The stub runner is []^{a,c,e} tall (Reference 16).

¹ Note that the Outside Diameter of the Channel Head is [[]^{a,c,e}.]^{a,c,e} and the Inside Radius of the Channel Head is

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5. The bottom head is a carbon steel casting SA-216 WCC or material of similar chemical composition and mechanical properties. Material Specification SA-508 Grade 3, Class 1 (formerly SA-508 Class 3) forging is one material that has been evaluated as similar and the analysis is bound by the properties of the casting.

Response:

Yes. The Point Beach Unit 1 steam generators' channel head (bottom head) are fabricated from []^{a,c,e} (Reference 11).

6. The upper vessel wall is SA-533 Type A Class 1 carbon steel or a material having similar properties. All Types and Classes specified in SA-533 are considered similar as the analysis is bound by the properties of the SA-533 Type A Class 1 material.

Response:

The Point Beach Unit 1 steam generators upper vessel walls are fabricated from []^{a,c,c} low alloy plate (Reference 11).

7. The tubesheet is SA-508 Grade 2 Class 1 (formerly SA-508 Class 2) or a low alloy steel material having similar properties. SA-508 Grade 2, Class 2 (formerly SA-508 Class 2a) and SA-508 Grade 3, Class 1 (formerly SA-508 Class 3) are considered similar as the analysis is bound by the properties of the SA-508 Grade 2 Class 1 (formerly SA-508 Class 2) material.

Response:

Yes. The Point Beach Unit 1 steam generator tubesheets are []^{a,c,e} forgings (Reference 11).

8. The channel head is clad with stainless steel weld material having properties similar to Type 304 stainless steel.

Response:

Yes. All internal surfaces of the Point Beach Unit 1 steam generator channel heads are clad with austenitic stainless steel []^{a,c,e} (Reference 11, Reference 13, and Reference 17).

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9. Both the stub runner and the divider plate are Alloy 600 plate materials and the welds are nickel-based Inconel ERNiCr-3 or ENiCrFe-3 (commonly referred to as FM82 or FM182, respectively).

Response:

Yes. The Point Beach Unit 1 steam generator channel heads are partitioned into inlet and outlet chambers by a by a stub runner and a divider plate [

 $]^{a,c,e}$ (Reference 11 and 16).

Yes. The Point Beach Unit 1 steam generators stub runner to divider plate welds and stub runner to Tubesheet welds are []^{a,c,e} material (References 12 and 13).

10. The design and transient loads used in the report bound the similar loads in the plant SG.

Response:

Yes. The design and transient loads used in the EPRI report bound the similar loads in the Point Beach Unit 1 SGs.

A comparison of the Point Beach Unit 1 steam generators against the parameters and transients used as the basis for the EPRI report (Reference 5) must look at both the operating conditions for the plant and those transients that are relevant to the Point Beach Unit 1 SG design basis to determine if the EPRI report applies.

Stress levels in the primary chamber of the Point Beach Unit 1 SGs result primarily due to pressure differences across the component surfaces. Thermal considerations play a much smaller role in defining the primary side stress levels, and in the case of the divider plate, induce a bending stress in the divider plate due to the approximate 70°F temperature difference between the SG inlet and outlet temperature (69.1°F for the EPRI report and [$]^{a,c,e^2}$ for Point Beach Unit 1) and a compressive stress in the divider plate resulting from the differential thermal growth between the divider plate [$]^{a,c,e}$ material and the SG carbon steel primary chamber (enveloped in the EPRI analysis for Models 51 and 44F steam generators). The thermal transients between plants will differ due to power levels and SG design, however, the temperature difference across the divider plate would not differ significantly and would, therefore, not be significant. Since the EPRI report uses a higher temperature difference across the divider plate, the Point Beach Unit 1 analysis would be enveloped for these conditions.

² Per Table A.1-1 of Reference 14: At High T_{avg} Reactor Vessel Outlet temperature = []^{a,c,e} and SG Outlet Temperature = []^{a,c,e}.

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Differences in design parameters affecting the qualification of the divider plate are due to the pressure differential across the tubesheet. The EPRI report, Table 3-12 of Reference 5, considered a Design, Upset and Faulted pressure differential of 1,515 psi, 1,836 psi, and 2,650 psi, respectively. Review of the pressure differentials for the Point Beach Unit 1 Station SG transients show that the pressure differentials in the EPRI Report envelope those for the Point Beach Unit 1 plant. The Design, Upset and Faulted (Loss of Secondary Pressure) pressure differentials for the Point Beach Unit 1 Station steam generators are [$]^{a,c,e3}$, [$]^{a,c,e4}$ and [$]^{a,c,e5}$ psi, respectively.

The Point Beach Unit 1 SG transients are defined in the Design Specification, Reference 14 and very similar to the transients listed in the Table 4-6 of EPRI report (Reference 5) except Hot Standby transient (See Table 1). In Table 4-1 of Reference 14, several transient occurrences were adjusted based on the plant operating history data analysis. The lifetime occurrences of Plant Loading/Plant Unloading (5%/Min), Unit Loading/Unit Unloading and of other corresponding transients are adjusted for in Table 1.

The Point Beach Unit 1 RSGs were replaced and operated on April 7 of 1984 and the license of the Unit 1 Plant will be expired on October 5, 2030 (Section 3.5.1 of Reference 7). Most recent, Point Beach Unit 1 has filed the Subsequent License Renewal from its current 60-year end-of-license period to 80-year end-of-subsequent-license renewal period. Because of this renewal, its license would not be expired until October 5, 2050 (Reference 15). Due to these facts, the actual years of operation for the RSGs of Point Beach Unit 1 will be 66.49 years until the end of its 80-year end-of-subsequent license renewal period. Table 4.3.1-1 of Reference 15 provides the results of the 80-year transient cycle projections for Point Beach Nuclear (PBN) Unit 1. As it is stated in Reference 15, *"Most nuclear power plants, including PBN, have experienced a significant declining trend in accumulation of transients over time. As shown in Table 4.3.1-1, the projected cycles for the 80-year subsequent period of extended operation (SPEO) are less than the original 40-year design cycles (Current Licensing Base cycles)." For the remaining lifetime of 66.49 years, the occurrences of all transients are adjusted by multiplying (66.49/80) to the lifetime occurrences for each transient of 80-year projection (see Table 1 for more details).*

In Table 4.3.1-1 of Reference 15, the Feedwater Cycling at Hot Standby for PBN Unit 1 has been defined as "N/A" (Not applicable - there is no basis for computing the upper bound) for 80-year projection cycle count. For conservatism, [$]^{a,c,e}$ design allowable cycles are used in Table 1.

The total transient occurrences for 40 years considered in Table 4-6 of the EPRI report (Reference 5), including Normal, Upset, and Faulted conditions, is 60,111 cycles. Similarly, the total transient occurrences for the next 66.49-year of operation for Point Beach Unit 1 Station, is projected to a

]^{a,c,e} pressure differential.

]^{a,c,e} pressure differential.

]^{a,c,e} pressure differential.

 $^{^3}$ At 300 second of 10% Step Load Increase = [

⁴ At 7 second of Loss of Load = [

⁵ At 100 second of Loss of Secondary Pressure = [

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total of []^{a,c,e} cycles, which is exhibiting a significant declining in accumulation of transients (See Table 1 for more details).

To conclude, comparison of the Point Beach Unit 1 steam generators against the parameters and transients used as the basis for the EPRI report (Reference 5) confirms that the design and transient load inputs for the Point Beach Unit 1 SGs are bounded by the loads used in the report. The EPRI report uses a larger temperature difference across the divider plate than the Point Beach Unit 1 analysis. Finally, the projected cycles for the 80-year subsequent period of extended operation are bounded by the original 40-year design cycles in the EPRI Report (Reference 5). The EPRI limiting model and results are applicable to Point Beach Unit 1.

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		EPRI Total Years=40		Point Beach		Point Beach		Point Beach		
				Total Years=60 (Design)		80-Year Projection		66.49-Year Projection ⁽³⁾		
		Lifetime	Frequency	Lifetime (1)	Frequency	Lifetime ⁽²⁾	Frequency	Lifetime	Frequency	a,c,
Normal	Heat-Up	200	5.00	Г						
Normal	Cool Down	200	5.00							
Normal	Plant Loading (5%/Min)	18,300	457.50							
Normal	Plant Unloading (5%/Min)	18,300	457.50							
Normal	Small Step Increase	2,000	50.00							
Normal	Small Step Decrease	2,000	50.00							
Normal	Large Step Decrease	200	5.00							
Normal	Hot Standby	18,300	457.50							
Normal	Turbine Roll Test	10	0.25							
Upset	Loss of Load	80	2.00							
Upset	Loss of Power	40	1.00							
Upset	Loss of Flow	80	2.00							
Upset	Reactor Trip	400	10.00							
Faulted	Feedline Break, SLB	1	0.03							
	Total	60,111	1,503							

Table 1: Transient Occurrences

Note:

1. Extracted from Table 2-1 of Reference 14.

2. Extracted from Table 4.3.1-1 of Reference 15.

3. Adjusted years of operation for Point Beach Unit 1 is based on Section 3.5.1 of Reference 7.

CONCLUSION

As demonstrated above, the industry analyses documented in the EPRI Technical Reports 3002002850, 1014982, and 1020988 are bounding for the Point Beach Unit 1 Station SG divider plate assemblies. Therefore, NextEra Energy Point Beach Unit 1 may manage the aging effect of primary water stress corrosion cracking (PWSCC) in those steam generator components in accordance with the guidance contained in LR-ISG-2016-01 which follows. The primary water chemistry program is supplemented with a general visual inspection of the SG channel head. The purpose of the visual inspection is to identify rust stains or other abnormal conditions which could indicate the presence of cracking (e.g., distortion of the divider plates). The general visual inspection is performed on each SG at least every 72 effective full power months or every three (3) refueling outages, whichever results in more frequent inspections.

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REFERENCES

- 1. Not used.
- 2. NRC LR-ISG-2016-01, "Changes to Aging Management Guidance for Various SteamGenerator Components," December 2016.
- 3. EPRI 3002002850, "Steam Generator Management Program: Investigation of Crack Initiation and Propagation in the Steam Generator Channel Head Assembly," October 2014.
- 4. EPRI Information Letter SGMP-IL-16-02, "Changes to Aging Management Guidance forSteam Generator Channel Head Components," October 2016.
- 5. EPRI 1014982, "Divider Plate Cracking in Steam Generators Results of Phase 1: Analysis of Primary Water Stress Corrosion Cracking and Mechanical Fatigue in the Alloy 600 Stub Runner to Divider Plate Weld Material," June 2007.
- 6. EPRI 1020988, "Steam Generator Management Program: Phase 2 Divider Plate Cracking Engineering Study," November 2010.
- Westinghouse Report WCAP-17905-P, Revision 3, "Model 44F Replacement Steam Generator Stress Report Addendum 3 for Point Beach Unit 1 Channel Head Bowl Drain Modification," December 2020.
- 8. Westinghouse Drawing No. 650B029, Revision 5, "Vertical Steam Generator Partition Plate."
- 9. Westinghouse Drawing No. 6524D18, Revision 2, "Steam Generator (44 Series) Channel Head Casting."
- 10. Westinghouse Drawing No. 1184J73, Revision 1, "Tube Plate Cladding & Mach Steam Generator Model 44-F."
- 11. Westinghouse Design Specification 955381, Revision 5, "NextEra Point Beach Unit 1 Model 44F Replacement Generators," September 2021.
- 12. Westinghouse Drawing No. 1184J66, Revision 2 "Tube Bundle and Chamber Assembly Steam Generator Model 44-F."
- Westinghouse Process Specification 82121XF, Revision 13, "Welding Nuclear Power Components to ASME Section III Manual (SMAW) Method With Inconel Electrode and Semi-Automatic Gas Metal Arc (GMAW) Method With Inconel Type Filler Metal," October 1980.
- 14. CN-CPS-08-4, Revision 1, "Summary of NSSS Design Transients for Point Beach Units 1 and 2 EPU Program," October 2014.
- 15. ML29329A247, NRC 2020-0032 Enclosure 3 "Point Beach Nuclear Plant Units 1 and 2 Subsequent License Renewal Application (Public Version)," Attachment 1, November 2020.
- 16. Westinghouse Drawing No. PL2499B40000, Revision 12, "Steam Generator Model 51 Partition Stub," June 1979.
- 17. Westinghouse Drawing No. 1184J63, Revision 4, "Channel Head Clad and Machine," July 1983.

Point Beach Nuclear Plant Docket Nos. 50-266; 50-301 L-2024-093 Enclosure

Enclosure 3

AFFIDAVIT CAW-24-026

(3 Pages Follow)

Westinghouse Non-Proprietary Class 3 AFFIDAVIT CAW-24-026

Commonwealth of Pennsylvania: County of Butler:

- I, Zachary Harper, Senior Manager, Licensing, 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-CECO-21-046 P-Attachment, Revision 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) 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.

Westinghouse Non-Proprietary Class 3 AFFIDAVIT CAW-24-026

- (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).
 - 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.

Westinghouse Non-Proprietary Class 3 AFFIDAVIT CAW-24-026

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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: 5/23/2024

au Signed electronically by

Zachary Harper