



Westinghouse Electric Company LLC  
Columbia Fuel Fabrication Facility  
5801 Bluff Road  
Hopkins, South Carolina 29061-9121  
USA

Director, Office of Nuclear Material Safety and  
Safeguards  
U. S. Nuclear Regulatory Commission  
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Your ref:

Our ref: LTR-RAC-24-58

November 21, 2024

SUBJECT: COLUMBIA FUEL FABRICATION FACILITY NOVEMBER 21, 2024, PRE-  
APPLICATION MEETING ON THE LEU+ BUILDING DESIGN – PROPRIETARY SLIDES

Dear Director:

Following the May 16, 2024, pre-application meeting on the proposed license amendment request for the Columbia Fuel Fabrication Facility low enriched uranium plus (LEU+) facility, Westinghouse Electric Company LLC (Westinghouse) requested a focused pre-application meeting to discuss the LEU+ building design. The proprietary slides for the November 21, 2024, pre-application meeting are enclosed with this letter.

This submittal contains proprietary information of Westinghouse. In conformance with the requirements of 10 CFR Section 2.390, as amended, of the Commission's regulations, Westinghouse is enclosing with this submittal an Affidavit. 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 this submittal or the Westinghouse Affidavit should reference AW-24-077 and should be addressed to Camille Zozula, Manager, Licensing and Regulatory Affairs, Westinghouse Electric Company, LLC Columbia Fuel Fabrication Facility, 5801 Bluff Road, Hopkins, SC, 29061-9121

Please contact Camille Zozula, Licensing and Regulatory Affairs for LEU+ if there are questions.

Sincerely,

A handwritten signature in blue ink that reads 'Stephen Subosits'.

[Stephen Subosits \(Nov 20, 2024 20:23 EST\)](#)

Stephen Subosits  
Regulatory Affairs Manager  
Westinghouse Columbia Fuel Fabrication Facility  
Docket 70-1151, License SNM-1107

Enclosures:

- 1) Affidavit, AW-24-077
- 2) Proprietary slides for November 21, 2024 pre-application meeting on LEU+ building design

cc:

NRC, Yawar Faraz  
NRC, Diana Woodyatt  
NRC, Thomas Vukovsky

WESTINGHOUSE NON-PROPRIETARY CLASS 3

LTR-RAC-24-58

Enclosure 1

November 21, 2024

**ENCLOSURE 1**

**AFFIDAVIT AW-24-077**

Commonwealth of Pennsylvania:

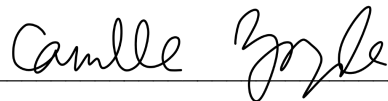
County of Butler:

- (1) I, Camille Zozula, Senior Manager, LEU+ Regulatory Affairs, 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 pre-application closed meeting slides on the LEU+ building design 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) (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: 11/20/2024



Signed electronically by

Camille Zozula