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LTR-NRC-25-28

May 28, 2025

Subject: Submittal of Westinghouse Topical Report WCAP-18951-P/NP, Revision 1, "TRITON11® Reference Fuel Design." (Proprietary/Non-Proprietary)

Enclosed are proprietary and non-proprietary versions of Westinghouse Electric Company LLC ("Westinghouse") topical report WCAP-18951-P/NP, Revision 1, "TRITON11® Reference Fuel Design," dated May 2025, submitted for United States Nuclear Regulatory Commission ("Commission") review and approval. Westinghouse respectfully requests that the Commission complete its review of the enclosed topical report by May 2027.

With the submittal of WCAP-18951-P/NP, Revision 1, Westinghouse is withdrawing WCAP-18951-P/NP, Revision 0 (EPID: L-2025-TOP-0010) from NRC review, and requests that no further review activities be undertaken by the NRC.

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, we are 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-25-035 and should be addressed to Jerrod A. Ewing, Manager, Operating Plants Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 1, Cranberry Township, PA 16066.

Jerrod A. Ewing, Manager
Operating Plants Licensing

cc: Ekaterina Lenning
Jennie Rankin

Enclosures:

(1) Affidavit, AW-25-035
(2) Westinghouse Topical Report WCAP-18951-P, Revision 1, "TRITON11® Reference Fuel Design." (Proprietary)
(3) Westinghouse Topical Report WCAP-18951-NP, Revision 1, "TRITON11® Reference Fuel Design." (Non-Proprietary)

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Commonwealth of Pennsylvania:
County of Butler:

(1) I, Jerrod Ewing, Manager, Operating Plants Licensing; Cranberry Township, PA, 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 WCAP-18951-P, Revision 1 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: 5/28/2025

Signed electronically by
Jerrod Ewing