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10 CFR 50.90

July 30, 2025

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: Partial Response to Requests for Additional Information — Limerick Generating Station Digital Plant Protection System

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. ML22269A569).

2. CEG letter to the NRC, "Resubmittal of 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) – To Address Proprietary Issues with INL HFE Reports," dated September 12, 2023 (ADAMS Accession No. ML23255A095).

3. Email from Michael Marshall, (NRC) to Ashley Rickey (CEG), “Limerick Generating Station, Units 1 and 2 – Request for Additional Information and Draft Requests for Confirmatory Information Regarding Limerick Digital Instrumentation and Controls License amendment Request (EPID L-2022-LLA-0140),” dated January 6, 2025 (ADAMS Accession No. ML25007A150).

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When separated, the cover letter, Attachment 2, and Attachment 3 are decontrolled.

4. Email from Michael Marshall, (NRC) to Ashley Rickey (CEG), “Limerick Generating Station, Units 1 and 2 – Request for Additional Information and Draft Requests for Confirmatory Information Regarding Limerick Digital Instrumentation and Controls License amendment Request (EPID L-2022-LLA-0140),” dated February 5, 2025 (ADAMS Accession No. ML25049A178).

5. CEG letter to the NRC, “Proposed Extension of Due Date of Request for Additional Information,” dated April 14, 2025 (ADAMS Accession No. ML25094A145).

6. NRC letter to CEG, “Limerick Generation Station, Unit Nos. 1 and 2 – Response to Proposed Extension of Due Date of Request for Additional Information re Component Interface Module (EPID L-2022-LLA-0140),” dated April 16, 2025 (ADAMS Accession No. ML25101A252).

7. Closed Meeting between NRC and CEG on June 25, 2025 regarding the Digital Modernization License Amendment Request (LAR) for Limerick Generating Station, Units 1 and 2 (Meeting Notice dated May 19, 2025, ADAMS Accession No. ML25139A586)

8. CEG letter to the NRC, “Proposed Extension - Response to Requests for Additional Information (RAIs),” dated July 2, 2025 (ADAMS Accession No. ML25183A133).

In Reference 1 Constellation Energy Generation, LLC (CEG) requested a License Amendment Request (LAR) to facilitate replacement of the Limerick Generating Station (LGS), Units 1 and 2 existing safety-related analog control systems with a single digital Plant Protection System (PPS). In Reference 2, CEG submitted a LAR supplement that replaced in its entirety the original LAR. CEG replaced the original submittal to address issues associated with proprietary/non-proprietary information.

In both the Reference 1 LAR submittal and Enclosure 1 to the Reference 2 LAR resubmittal, CEG indicated that the LAR was developed and submitted in accordance with the Alternate Review Process (ARP) guidance in NRC Digital Instrumentation and Control (DI&C) Interim Staff Guidance (ISG)-06, “Licensing Process.”

In Reference 3, the NRC provided four requests for confirmatory information (RCIs) and eight requests for additional information (RAIs) (i.e., RAI-24 through -31) to support the NRC’s review of the Reference 2 LAR. As part of Reference 3, the NRC requested CEG to provide responses to the RCIs and RAIs by April 6, 2025.

In Reference 4, the NRC provided five additional RAIs (i.e., RAI-32 through -36) to support the NRC's review of the Reference 2 LAR. As part of Reference 4, the NRC requested CEG to provide responses to the five additional RAIs by April 7, 2025.

In Reference 5, CEG requested an additional 90 days, through July 7, 2025, to provide a response to all open RAIs (RAI-24 through -36). Reference 6 is the NRC approval of the extension request.

Based on discussions during the Reference 7 meeting, in Reference 8 CEG requested an additional 60 days from the date of Reference 5 to provide responses to all open RAIs (RAI-24 through -36) (i.e., September 5, 2025).

Attachment 1 to this letter provides responses to seven of the RAIs (i.e., RAI-24, -26, -29, and -33 through -36). This attachment incudes two Appendices. CEG will submit the responses to RAI-25, -27, -28, -30, -31, and -32 on or before the requested date of September 5, 2025.

Attachment 1 and the two associated appendices include information proprietary to Westinghouse Electric Company, LLC (WEC). Attachment 2 to this letter provides a non-proprietary version of Attachment 1. Attachment 3 provides an affidavit signed by WEC, the owner of proprietary information in Attachment 1. 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 contained 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 WEC proprietary information or the WEC affidavit provided in the applicable attachment should reference this affidavit.

CEG has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, which was previously provided to the NRC in the Reference 1 and 2 letters. CEG has concluded that the information provided in this 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 RAI response 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 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 license amendment request supplement by transmitting a copy of this letter to the designated State Official.

If you have any questions regarding this submittal, then please contact Ms. Ashley Rickey at Ashley.Rickey@Constellation.com.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 30th day of July 2025.

Respectfully,

Wendi Para
Senior Manager - Licensing
Constellation Energy Generation, LLC

Attachment 1	Response to RAI-24, -26, -29, and -33 through -36 (Proprietary)	
Attachment 2	Response to RAI-24, -26, -29, and -33 through -36 (Non-Proprietary)	
Attachment 3	WEC Affidavit CAW-25-038 for WEC Proprietary Information in Attachment 1	

cc:	USNRC Region I, Regional Administrator	w/ attachments
	USNRC Project Manager, LGS	“
	USNRC Senior Resident Inspector, LGS	“
	Director, Bureau of Radiation Protection – Pennsylvania Department of Environmental Protection	“

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ATTACHMENT 2

Response to RAI-24, -26, -29, and -33 through -36 (Non-Proprietary)

Limerick Generating Station, Unit 1 and Unit 2
NRC Docket Nos. 50-352 and 50-353

From October 7 to November 5, 2024, the NRC staff conducted a regulatory audit focused on the CIM system, which is a key subsystem of the Limerick digital modernization project outlined within Constellation digital I&C LAR submitted by letter dated September 26, 2022 and supplemented with several additional submittals. The audit was conducted with the intent to gain understanding, to verify information, and to identify information that will require docketing to support the basis of a licensing or regulatory decision. While performing a regulatory audit assists the NRC staff in efficiently conducting its review and gaining insights to the licensee's processes and procedures, information that the NRC staff relies upon to make the safety determination must be submitted on the docket.

Technical Basis for RAIs

The proposed Limerick digital I&C system architecture incorporates component interface modules (CIMs) that are shared by the plant protection system (PPS), diverse protection system (DPS), and the distributed control system (DCS). A CCF of the CIMs would result in a loss of all automatic control and manual control from the control room, as well as field component status information of critical core cooling and isolation functions, because **[[ ]]**. Constellation claims that the CIM is not susceptible to a CCF because of a "holistic consideration" of:

- **[[ ]]**
- **[[ ]]**
- **[[ ]]**

However, the complete technical basis supporting this "holistic consideration" is not described in the LAR or its supplements. Sufficient information has not been provided by Constellation in the LAR, as supplemented, that supports the licensee's claim that the CIM is not susceptible to a CCF.

RAI-24

The Limerick digital I&C LAR, as supplemented, does not contain a complete description of how the CIM interfaces with the DPS. During the audit, the NRC staff was provided a more complete description of the signal paths from the DPS to the CIM, and from the field components back to the operator displays on the DPS screens.

Provide a sketch or diagram showing the complete signal path and all devices in use (from sensor through output component actuator and feedback from actuated component to the display screens) when the DPS is required to be in operation because of a failure of the PPS. In the sketch or diagram, as a minimum:

- Identify the signal path from the sensor isolation from the PPS input isolator through the DPS Ovation Controller, through any signal processing needed to generate an actuation signal, spurious actuation elimination, any output isolation relays, and CIM input.

Constellation Energy Generation, LLC (CEG) Response to RAI-24, Bullet 1:

[[ ]]

- Include signal path connections between typical field components (e.g., valve actuators and pump breakers or motor control centers) which provides feedback from these components to the DPS displays. Also indicate on this diagram **[[ ]].**

CEG Response to RAI-24, Bullet 2:

[[ ]]

- Indicate the signal path media used (e.g., fiber optic, hardwired, ethernet, etc.) for each of the signal paths.

CEG Response to RAI-24, Bullet 3:

[[ ]].

Additional Technical Basis for RAIs 25 to 31

In its letters dated August 12, 2022 and September 26, 2022, the licensee states that it performed a defense in depth and diversity assessment to demonstrate that vulnerabilities to CCF have been adequately addressed as recommended in NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR

Edition," Chapter 7, "Instrumentation and Controls," Branch Technical Position (BTP) 7-19, Revision 8, "Guidance for Evaluation of Defense In Depth and Diversity to Address Common-Cause Failure Due to Latent Design Defects in Digital Safety Systems."

The NRC staff is using the guidance in BTP 7-19 and nuclear industry standard IEEE 7-4.3.2-2016 to review the adequacy of how the licensee has addressed the susceptibility of the CIM to a CCF.

BTP 7-19, Revision 8 states in part:

> CCF vulnerabilities of DI&C systems or components are addressed using the principles of defense in depth. Under these principles, the operation of facility systems is modeled as a series of successive layers of defense (called "echelons of defense"), each of which would need to be defeated for a CCF to result in unacceptable harm to public health and safety. A CCF could affect multiple echelons of defense and redundant divisions, depending upon, for example, the system architecture, level of integration, and type and use of shared resources. [emphasis added]

An overall DI&C system architecture that maintains the integrity of multiple layers of defense is key to ensuring a system's ability to limit, mitigate, or withstand or cope with the effects of a CCF. Traditional design techniques such as redundancy, independence, and diversity ensure that the architecture provides the basic framework and structure for maintaining defense in depth.

Generally, except in a few structures, systems, and components (SSCs) with very simple designs, DI&C systems containing software or logic cannot be fully tested, nor can their failure modes be completely predicted, because software has too many potential failure modes for deterministic predictions to be feasible. Therefore, DI&C systems may be vulnerable to CCF if either (1) identical system designs and identical copies of the software or software-based logic are present in redundant divisions of the systems, or (2) the DI&C systems are integrated and interconnected (e.g., they use shared resources). [emphasis added]

Thorough testing can help to identify latent design defects in DI&C systems, provided the design is simple enough to allow such testing. Testing can be used to uncover latent design defects for correction in the design process and to demonstrate that any identified latent design defects have been corrected. The reviewer should determine whether testing of the proposed DI&C system or component shows that all latent design defects have been identified and corrected, so that the system or component will function as specified under the anticipated operational conditions. If so, the CCF can be eliminated from further

consideration." [emphasis added]

IEEE 7-4.3.2-2016, Clause 5.18 "Simplicity" states:

> It is recognized that the simplicity is not a measurable characteristic of a safety system. As such, no acceptable degree of simplicity can be established for these systems however, measures should be taken to avoid unnecessary complexity. Added complexity associated with the performance of functions not directly related to the safety function may introduce design errors or create system hazards. [emphasis added]

Statements are made in several places throughout the submittal documents regarding the licensee's assertion that the CIM is not susceptible to a CCF. For example, Section 9.3.1, "Separation," of WCAP-18598-P, Revision 2 states:

> *The extensive testing performed on the CIM and the diversity attributes of the CIM design are described in the PPS D3 Analysis (Reference 11). As a result, there is reasonable assurance that the CIM is not susceptible to a CCF. It can be concluded then, that the actuation signals from the RRCS [redundant reactivity control system] and DPS are functionally independent from the PPS.*

Section 9.3.2, "Diversity," of WCAP-18598-P also states, "*the RRCS/DPS actuation signal outputs go through the Z-port of the CIM and there is reasonable assurance that the CIM is not susceptible to a CCF*." Also, Table 3.2.5-1, "*DI&C [digital instrumentation and controls]-ISG [interim staff guidance]-04 Section 2 Compliance*", Item 2 states: "*The CIM is not susceptible to a Common Q CCF because of its diversity in design."*

Section 2.2, "PPS Architecture CCF Vulnerabilities," within document WNA-AR-01074-GLIM-P Revision 4 states:

> *The CIM, due to its design, is still considered available and not susceptible to a CCF. There are two legs to the safety case for this conclusion. The first is the extensive testing performed on the CIM. This testing is compared to the testing criteria in BTP 7-19 (Reference 2), Section B.3.1.2 in WNA-LI-00096-GEN, "Evaluation of Common Cause Failure Susceptibility of Component Interface Module" (Reference 4) and correlates the CIM tests to the BTP 7-19 criteria.*
>
> *The second leg of the CIM safety case regarding CCF is the similarity in design attributes and process to the Main Steam Isolation and Feedwater Isolation System (MSFIS) implemented at Wolf Creek (Reference 6). WNA-AR-01054-GEN, "CIM*

Diversity Analysis" (Reference 5) provides the evaluation of the key design features of the CIM that are used to address the risk of CCF and eliminating CCF vulnerabilities from further consideration.

These two safety case arguments together (extensive testing and diverse design attributes) provide the holistic argument that the CIM does not need to be considered vulnerable to a CCF for this analysis.

RAI-26

The Limerick digital I&C LAR, as supplemented, does not contain a description of the software design scope and processes necessary to create the HDL needed to create the gate logic implemented in the CIM FPGA. Describe the full scope of the software developed to program the FPGA. The description should include a complete set of block diagrams, logic diagrams, and finite state machine diagrams describing each submodule (e.g., Y-port, X-port, CIM logic wrapper, etc.,) of CIM functional logic needed to accomplish the intended functions of the CIM. It should also describe the scope of software needed for each of the three major elements described in WNA-AR-01074-GLIM, namely a) the priority logic, b) the component control logic, and c) the on-board diagnostic features, which include the
[[ ]]

CEG Response to RAI-26:

[[.]].

RAI-29

The Limerick digital I&C LAR, as supplemented, does not contain a sufficiently complete description of the basis of the licensee's claim of **[[ ]].** Section 2.2.1 of WNA-AR-01074-GLIM claims CIM "non-susceptibility to a CCF" by asserting different arguments. For example, when comparing the CIM's characteristics to the Wolf Creek MSFIS NRC staff's safety evaluation (SE), the licensee only quoted a small subsection within the NRC staff's safety evaluation for the Wolf Creek MSFIS application. In addition to the quoted portions of the SE offered by the licensee in its submittal, the MSFIS SE stated in part:

[[ ]] [emphasis added]

In addition, the NRC staff understands that in the Advanced Logic System (ALS) Topical Report (ML13298A095 and ML13298096) submitted for NRC staff review by the licensee's vendor in 2011, (based on a generic ALS-based platform), the ALS

(and also the CIM-SRNC) designer stated for high-safety significance systems (HSSS), in a similar fashion to **[[ ]]** SE, it would incorporate independent design teams that would use different versions of HDL when developing HSSS as one method to ensure adequate diversity in the development of an ALS-based application.

However, in the Limerick submittal, although the complexity and high-safety significant nature of the CIM-SRNC system is markedly increased from that of **[[ ]]**, the licensee did not apply independent design teams using different versions of HDL or other substantial diversity measures that would satisfy the licensee's argument that the **[[ ]]** of its CCF susceptibility claim is valid.

Provide detailed information relevant to the application-specific use of the CIM-SRNC in the Limerick project that clearly demonstrates how diversity design measures of the CIM-SRNC that were implemented during the CIM-SRNC's development process are applicable to the Limerick project such that it supports the licensee's claim of adequate 'diverse design attributes' of the Limerick CIM-SRNC. Include in this description an explanation of how the sentences within the NRC Safety Evaluation for the Wolf Creek MSFIS application that were not considered within Section 2.2.1 of the WNA-LI-01074-GLIM statements regarding comparison with the Wolf Creek MSFIS application would or would not also be deemed appropriate to the Limerick LAR application.

CEG Response to RAI-29:

[[ ]].

Regulatory Basis for RAIs 33 to 36

Per the requirement listed below, protection systems need to be designed for high functional reliability.

- Criterion 21, "Protection system reliability and testability" of 10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants", in part, that the protection system shall be designed for **high functional reliability** and inservice testability commensurate with the safety functions to be performed and that the protection system shall be designed to permit periodic testing of its functioning when tie reactor is in operation, including a capability to test channels independently to determine failures and losses of redundancy that may have occurred. [emphasis added]

RAI-33

In the Constellation's letter dated June 14, 2024 (i.e., response to RAI #15c), the licensee states **[[ ]]**. Constellation's discussion does not describe how the **[[ ]]**.

a) Describe how the **[[ ]]** would be tested and conducted to verify operability of the execute functions of the safety system.

Response to RAI-33.a):

[[ ]].

b) If **[[**……..**]]** are not conducted at the local control panel, how are **[[ ]]** impacting the execute functions of the safety system tested and conducted? For example, how would periodic testing and surveillance of the execute functions of the safety system be conducted, if the **[[ ]]** are not used?

CEG Response to RAI-33.b):

[[ ]].

c) Describe the procedural steps that will be taken to perform periodic maintenance or surveillance of the actuation logic for valves and pumps driven by the CIM modules, including surveillance testing of the high amperage relay panel (HARP) and its output actuation circuits

CEG Response to RAI-33.c):

[[ ]].

RAI-34

Multiple locations within WNA-AR-01074-GLIM, including Figure 2-3, "CIM Safety Path Testing," show or describe **[[ ]].** In the Constellation's letter dated June 14, 2024 (i.e., response to RAI 17), the licensee stated that the OCT function is not being credited in the Limerick application. Since there is not going to be an automated continuous **[[ ]]**, please provide an explanation as to how periodic technical specifications surveillances will be conducted to **[[ ]]** and the field-installed safety related valves and pumps.

CEG Response to RAI-34

[[ ]].

RAI-35

Related to display screens and the means for displaying diagnostic information to plant operators:

a) Please provide an explanation of how the CIM self-diagnostics and announcements provide information to plant operators on available display screens. Are these diagnostic indications provided to the Safety System Display Screens of the plant protection system (PPS) only, or are they also fed to the distributed control system (DCS) and diverse protection system (DPS) displays?

CEG Response to RAI-35.a):

[[ ]].

b) If the CIM self-diagnostics are fed only to the PPS and the PPS experiences a complete failure, how would operators using the DPS in the event of a failure of the PPS know that a CIM diagnostic has determined a failure exists within a CIM module?

CEG Response to RAI-35.b):

[[ ]].

RAI-36

Section 2.2.1 of Document WNA-AR-01074-GLIM, "Limerick Generating Stations Units 1 & 2 Digital Modernization Project--Defense in Depth and Diversity Common Cause Failure Coping Analysis," states **[[ ]]**. A description of how the operating experience demonstrates high reliability is not in the application, as supplemented. In addition to the experience cited by the licensee, there is operating experience involving the CIM in other reactor types. The NRC staff has had interactions with other nuclear regulatory organizations about the operating experience at a European nuclear plant where CIMs in a digital protection system experienced failures due to the same root cause in multiple modules of the same type at the same unit, albeit not simultaneously.

a) Describe the operating experience demonstrating the highly reliable operation of CIM and CIM-SRNC proposed for Limerick PPS that are currently in service in any operating domestic or foreign reactor safety applications, as described in Section 2.2.1 of Document WNA-AR-1074-GLIM. In the description include: 1) reliability analysis or calculation estimates and expected in-service lifetime (e.g., in expected error-free years of operation) of these modules; and 2) summary of actual historical operating

experience, including the numbers of modules that have been in service in reactors and summary of operational failures encountered while in service. Do not include failures due to damage caused or induced by technicians during construction installation or construction testing.

CEG Response to RAI-36.a):

[[ ]].

b) Describe the technical basis for the statements in Section 2.2.1 of the WNA-AR-1074-GLIM document regarding the CIM operating history as being **[[ ]]**. The description could include information such as:

v) quantitative reliability data for the CIM, such as the number of reactor operating hours achieved to date and the number and types of failures experienced by the CIM system modules proposed for Limerick.

vi) documents with descriptions of the number and types of module failures that have been reported or discovered during or after site acceptance testing and startup at any referenced AP1000 reactors.

vii) documentation that describes the highly reliable operations and failures of the SRNC modules, if any.

viii) documentation analyzing the root causes that were found to have contributed to the failures of the CIM and SRNC modules, and whether any of the types and root causes of these failures could be considered as a repeated failure that is of the same type of failures occurring among the many CIM and SRNC modules that have been produced and are in operation regardless of whether they occurred simultaneously with such similar failures within other modules.

Response to RAI-36.b).i):

[[ ]].

Response to RAI-36.b).ii):

[[ ]].

Response to RAI-36.b).iii):

[[ ]].

Response to RAI-36.b)iv):

[[ ]].

c) Provide a summary of the types and numbers of failures that have occurred in completed CIM and SRNC modules that were discovered during production testing prior to shipment, if any, and the root causes of those failures. Describe how those root causes have been addressed to prevent future failures from occurring in future production testing or post-production stages.

Response to RAI-36.c):

[[ ]].

ATTACHMENT 3
Non-Proprietary

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

WEC Affidavit CAW-25-038
For Proprietary Information in Attachment 1
(3 pages)

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 LIM-25-108-P, Revision 0 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: 7/21/2025

Signed electronically by
Jerrod Ewing

Approval Information

Manager Approval Ewing Jerrod Jul-21-2025 12:59:27

Files approved on Jul-21-2025