



FEB 23 2012

L-2012-068
10 CFR 50.90
10 CFR 2.390

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Response to NRC Instrumentation and Control Engineering Branch Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205

References:

- (1) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), "License Amendment Request for Extended Power Uprate (LAR 205)," (TAC Nos. ME4907 and ME4908), Accession No. ML103560169, October 21, 2010.
- (2) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-005), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Instrumentation & Control (I&C) Issues – Round 1," Accession No. ML110330190, January 28, 2011.
- (3) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-153), "Response to NRC Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205 and Instrumentation and Controls Issues," Accession No. ML11115A113, April 22, 2011.
- (4) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-190), "Response to NRC Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205 and Instrumentation and Controls Issues," Accession No. ML11174A165, June 21, 2011.
- (5) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-302), "Response to NRC RAI Regarding EPU LAR No. 205 and Technical Specification and Instrumentation and Control Issues," Accession No. ML11242A159, August 29, 2011.
- (6) Technical Specification Task Force (TSTF) No. 493, Rev. 4, "Clarify Application of Setpoint Methodology for LSSS Functions," January 2010.
- (7) WCAP-17070-P, Revision 1, "Westinghouse Setpoint Methodology for Protection Systems for Turkey Point Units 3 and 4 (Power Uprate to 2644 MWt – Core Power)," June 2011.
- (8) Email from J. Paige (NRC) to S. Hale (FPL), "Questions Regarding Instrument Uncertainty," January 12, 2012.
- (9) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-033), "Response to NRC Instrumentation and Control Engineering Branch Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205," Accession No. ML12023A032, January 19, 2012.
- (10) Email from J. Paige (NRC) to S. Hale (FPL), "Instrumentation and Controls (EICB) Request for Additional Information," Accession No. ML12026A460, January 25, 2012.

A001
NRC

- (11) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-034), "Response to NRC Instrumentation and Control Engineering Branch Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205," Accession No. ML12033A138, January 31, 2012.
- (12) Email from J. Paige (NRC) to S. Hale (FPL), "DRAFT: Instrumentation and Controls (EICB) Request for Additional Information," February 9, 2012.

By letter L-2010-113 dated October 21, 2010 [Reference 1], Florida Power and Light Company (FPL) requested to amend Renewed Facility Operating Licenses DPR-31 and DPR-41 and revise the Turkey Point Units 3 and 4 (PTN) Technical Specifications (TS). The proposed amendment will increase each unit's licensed core power level from 2300 megawatts thermal (MWt) to 2644 MWt and revise the Renewed Facility Operating Licenses and TS to support operation at this increased core thermal power level. This represents an approximate increase of 15% and is therefore considered an extended power uprate (EPU).

FPL responded to several Requests for Additional Information (RAIs) from the U. S. Nuclear Regulatory Commission's (NRC) Instrumentation and Control Engineering Branch (EICB) [References 2, 3, 4, & 5] regarding PTN's site specific implementation of TSTF-493 Option A [Reference 6] via the setpoint methodology provided in WCAP-17070-P [Reference 7].

On January 12, 2012, the NRC Project Manager (PM) issued an RAI on behalf of the EICB staff via an email [Reference 8] consisting of two questions pertaining to the treatment of instrument uncertainty and the corrective action program. On January 19, 2012, FPL provided its response to the second RAI question on corrective action program applicability via letter L-2012-033 [Reference 9].

On January 25, 2012, following a telephone conference between NRC, FPL, and Westinghouse representatives, the NRC PM reissued the EICB RAI in which the language in the first RAI question was revised [Reference 10]. The NRC also indicated that FPL's earlier response to the second RAI question [Reference 9] needed some further clarification. On January 31, 2012, FPL provided its response to these NRC RAIs [Reference 11].

On February 9, 2012, the NRC PM issued another RAI on behalf of the EICB staff via an email [Reference 12] consisting of four parts pertaining to the setpoint monitoring program for non-EPU affected RTS and ESFAS setpoints. During a follow-up teleconference call on February 16, 2012, the NRC clarified that the concern was on how adjustments to OP Δ T and OT Δ T setpoints are periodically implemented to account for hot leg streaming effects over the fuel cycle under EPU conditions. FPL's response is presented in Attachments 1 and 2 to this letter.

Attachment 3 contains the application for withholding the proprietary information contained in Attachment 2 from public disclosure. As Attachment 2 contains information proprietary to Westinghouse Electric Company, LLC (Westinghouse), it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis for which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of §2.390 of the Commission's regulations. Accordingly, it is respectfully requested that information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of items in the response to the RAI questions in Attachment 2 of this letter or the supporting Westinghouse affidavit should reference CAW-12-3403 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, Suite 428, 1000 Westinghouse Drive, Cranberry Township, PA 16066.

This submittal does not alter the significant hazards consideration or environmental assessment previously submitted by FPL letter L-2010-113 [Reference 1].

This submittal contains no new commitments and no revisions to existing commitments.

In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the State Designee of Florida.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Licensing Manager, at (305) 246-7327.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 23, 2012.

Very truly yours,



Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Attachments (3)

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Resident Inspector, Turkey Point Nuclear Plant
Mr. W. A. Passetti, Florida Department of Health (without Attachment 2)

Turkey Point Units 3 and 4

RESPONSE TO NRC INSTRUMENTATION AND CONTROL ENGINEERING BRANCH
REQUEST FOR ADDITIONAL INFORMATION REGARDING
EXTENDED POWER UPRATE LICENSE AMENDMENT REQUEST NO. 205

ATTACHMENT 1

**RAI RESPONSE
(Non-Proprietary)**

Response to Request for Additional Information

The following information is provided by Florida Power and Light Company (FPL) in response to the U. S. Nuclear Regulatory Commission's (NRC) Request for Additional Information (RAI). This information was requested to support License Amendment Request (LAR) 205, Extended Power Uprate (EPU), for Turkey Point Nuclear Plant (PTN) Units 3 and 4 that was submitted to the NRC by FPL via letter (L-2010-113) dated October 21, 2010 (Reference 1).

FPL responded to several RAIs from the NRC's Instrumentation and Control Engineering Branch (EICB) (References 2, 3, 4, & 5) regarding PTN's site specific implementation of TSTF-493 Option A (Reference 6) via the setpoint methodology provided in WCAP-17070-P (Reference 7).

On January 12, 2012, the NRC Project Manager (PM) issued an RAI on behalf of the EICB staff via an email (Reference 8) consisting of two questions pertaining to the treatment of instrument uncertainty and the corrective action program (CAP). On January 19, 2012, FPL provided its response to the 2nd RAI question on CAP applicability via letter L-2012-033 (Reference 9). On January 25, 2012, following a telephone conference between NRC, FPL, and Westinghouse representatives, the NRC PM reissued the EICB RAI in which the language in the first RAI question was revised (Reference 10). The NRC also indicated that FPL's earlier response to the second RAI question (Reference 9) needed some further clarification. On January 31, 2012, FPL provided its response to these questions via letter L-2012-034 (Reference 11). On February 9, 2012, the NRC PM issued a draft RAI on behalf of the EICB staff via an email (Reference 12) consisting of four parts pertaining to the setpoint monitoring program for non-EPU affected Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) setpoints. During follow-up teleconference calls on February 16 and 21, 2012, the NRC clarified that their concern was focused on how adjustments to OPΔT and OTΔT setpoints are implemented in order to accommodate hot leg streaming effects over the fuel cycle under EPU conditions. FPL's response to this issue is presented in this non-proprietary attachment (Attachment 1) and in the proprietary attachment (Attachment 2) to this letter.

The affidavit that sets forth the basis for which the information may be withheld from public disclosure by the NRC in accordance with 10 CFR 2.390 is contained in Attachment 3. Proprietary information is contained within brackets and the basis for claiming the information as proprietary is indicated by means of lower case letters (a) - (f) located as a superscript immediately following the brackets enclosing each item of information identified as proprietary. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) - (4)(ii)(f) of the affidavit accompanying this submittal pursuant to 10 CFR 2.390(b)(1). In this attachment, the proprietary information has been deleted and only the brackets remain.

NRC RAI:

Explain how Hot Leg streaming is addressed in the Overtemperature ΔT (OTΔT) and Overpower ΔT (OPΔT) reactor trip uncertainty calculations, Tables 3-2 and 3-3 of WCAP-17070-P Revision 1. Also, provide information on how the Turkey Point plant will satisfy the requirements of the uncertainty calculations with regard to Hot Leg streaming.

Response:

The Process Measurement Accuracy (PMA) terms associated with Hot Leg streaming are:

OTΔT Table 3-2, page 21, and Table 3-13, page 48, in WCAP-17070-P Revision 1:

[] a,c

OPΔT Table 3-3, page 25, and Table 3-14, page, 50 in WCAP-17070-P Revision 1:

[] a,c

The uncertainty calculations are based on the plant []^{a,c} of:

[] a,c

[] a,c

On at least a quarterly basis, FPL obtains readings of the Eagle 21 system for T_{HOT} , T_{COLD} , ΔT , T_{AVG} , T' , T'' on all three channels and performs calculations to determine if ΔT_0 , T' or T'' need to be renormalized. If normalization of ΔT_0 , T' or T'' is required, FPL normalizes ΔT_0 , T' and T'' on the Eagle 21 channels.

For EPU, normalization of Eagle 21 parameters and power range excore neutron detectors are conducted on a quarterly surveillance interval. The normalization process supporting the EPU OPDT and OTDT setpoints is being included in plant procedures and controlled using the plant surveillance tracking program as part of the EPU implementation process. For Eagle 21 RPS:

- ΔT_0 is identified in the Eagle 21 RPS as “Tuning Constant” DELTA T0
- T' is identified in the Eagle 21 RPS as “Tuning Constant” TAVG0 FULL OTSP
- T'' is identified in the Eagle 21 RPS as “Tuning Constant” TAVG1 FULL OPSP

The new Tuning Constant values for ΔT_0 , T' and T'' are directly entered in °F into the Eagle 21 RPS utilizing the Eagle computer interface. This is accomplished by performance of a quarterly maintenance surveillance procedure.

References

1. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), “License Amendment Request for Extended Power Uprate (LAR 205),” (TAC Nos. ME4907 and ME4908), Accession No. ML103560169, October 21, 2010.
2. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-005), “Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Instrumentation & Control (I&C) Issues – Round 1,” Accession No. ML110330190, January 28, 2011.
3. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-153), “Response to NRC Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205 and Instrumentation and Controls Issues,” Accession No. ML11115A113, April 22, 2011.
4. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-190), “Response to NRC Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205 and Instrumentation and Controls Issues,” Accession No. ML11174A165, June 21, 2011.
5. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-302), “Response to NRC RAI Regarding EPU LAR No. 205 and Technical Specification and Instrumentation and Control Issues,” Accession No. ML11242A159, August 29, 2011.
6. Technical Specification Task Force (TSTF) No. 493, Rev. 4, “Clarify Application of Setpoint Methodology for LSSS Functions,” January 2010.
7. WCAP-17070-P, Revision 1, “Westinghouse Setpoint Methodology for Protection Systems for Turkey Point Units 3 and 4 (Power Uprate to 2644 MWt – Core Power),” June 2011.
8. Email from J. Paige (NRC) to S. Hale (FPL), “Questions Regarding Instrument Uncertainty,” January 12, 2012.

9. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-033), "Response to NRC Instrumentation and Control Engineering Branch Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205," Accession No. ML12023A032, January 19, 2012.
10. Email from J. Paige (NRC) to S. Hale (FPL), "Instrumentation and Controls (EICB) Request for Additional Information," January 25, 2012.
11. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-034), "Response to NRC Instrumentation and Control Engineering Branch Request for Additional Information Regarding Extended Power Uprate License Amendment Request No. 205," Accession No. ML12033A138, January 31, 2012.
12. Email from J. Paige (NRC) to S. Hale (FPL), "DRAFT: Instrumentation and Controls (EICB) Request for Additional Information," February 9, 2012.

Turkey Point Units 3 and 4

RESPONSE TO NRC INSTRUMENTATION AND CONTROL ENGINEERING BRANCH
REQUEST FOR ADDITIONAL INFORMATION REGARDING
EXTENDED POWER UPRATE LICENSE AMENDMENT REQUEST NO. 205

ATTACHMENT 3

Westinghouse Affidavit CAW-12-3403 for Attachment 2

This coversheet plus 7 pages



Westinghouse Electric Company
Nuclear Services
1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066
USA

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Direct tel: (412) 374-4643
Direct fax: (724) 720-0754
e-mail: greshaja@westinghouse.com
Proj letter: FPL-12-53

CAW-12-3403

February 22, 2012

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

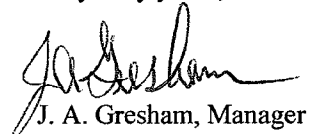
Subject: FPL-12-53 P-Attachment, "Turkey Point Units 3 and 4 – Response to NRC Verbal RAI on Hot Leg Streaming Normalization for the Delta-T Trip Functions for Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 (TAC Nos. ME 4907 and ME 4908)"
(Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-12-3403 signed by the owner of the proprietary information, Westinghouse Electric Company LLC. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Florida Power and Light.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-12-3403, and should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 428, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Very truly yours,


J. A. Gresham, Manager
Regulatory Compliance

Enclosures

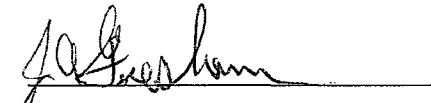
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

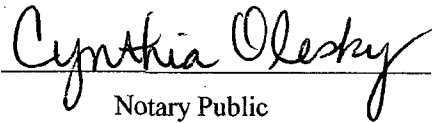
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared J. A. Gresham, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



J. A. Gresham, Manager
Regulatory Compliance

Sworn to and subscribed before me
this 22nd day of February 2012



Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Cynthia Olesky, Notary Public
Manor Boro, Westmoreland County
My Commission Expires July 16, 2014
Member, Pennsylvania Association of Notaries

- (1) I am Manager, Regulatory Compliance, in Nuclear Services, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (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 the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, 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.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

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.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
- (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
- (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in FPL-12-53 P-Attachment, "Turkey Point Units 3 and 4 – Response to NRC Verbal RAI on Hot Leg Streaming Normalization for the Delta-T Trip Functions for Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 (TAC Nos. ME 4907 and ME 4908)" (Proprietary), for submittal to the Commission, being transmitted by Florida Power and Light letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse for use by Turkey Point Units 3 and 4 is expected to be applicable for other licensee submittals in response to certain NRC requirements for Extended Power Uprate (EPU) submittals and may be used only for that purpose.

This information is part of that which will enable Westinghouse to:

- (a) Provide input to the U.S. Nuclear Regulatory Commission for review of the Turkey Point Extended Power Uprate (EPU) submittals.
- (b) Provide additional information related to instrument uncertainties.
- (c) Provide licensing support for customer submittal.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of this information to its customers for purposes of meeting NRC requirements for licensing documentation.
- (b) Westinghouse can sell support and defense of the technology to its customer in the licensing process.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

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 calculations 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.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

Proprietary Information Notice

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary 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 (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

Copyright Notice

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.