



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 19, 2019

Site Vice President
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REQUEST FOR
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
(EPID L-2018-LLA-0112)

Dear Sir or Madam:

By letter dated January 19, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19019A025), Entergy Operations, Inc. (the licensee) submitted an affidavit dated January 8, 2019 (CAW-19-4851), executed by Korey L. Hosack, of Westinghouse Electric Company, LLC, requesting that the information contained in the following document be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

LRT-SGMP-18-45 P-Attachment, Revision 0, "Responses to Request for Additional Information Regarding Waterford 3 Amendment Request for Revision of UFSAR [Updated Final Safety Analysis Report] Section 3.9 to Incorporate the TRANFLOW Computer Code (Proprietary)"

A nonproprietary copy of this document has been placed in the Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the NRC Library in ADAMS at the above-referenced Accession No. ML19019A025.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (a) This information is part of that which will enable Westinghouse to describe the computer code, TRANFLOW, and to benchmark calculated pressure drops using TRANFLOW with other NRC approved computer code results.
- (b) Further, this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of similar information to its customers for the purpose of meeting NRC requirements for licensing documentation supporting the use of the computer code, TRANFLOW, during replacement steam generator design.

- (ii) Westinghouse can sell support and defense industry guidelines and acceptance criteria for plant-specific applications.
- (iii) 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 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.

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.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

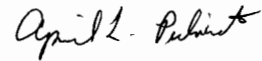
Therefore, the version of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions, please contact me at 301-415-1390 or via e-mail at April.Pulvirenti@nrc.gov.

Sincerely,



April L. Pulvirenti, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

cc: Korey L. Hosack
Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, PA 16066

Listserv

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