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SIEMENS

December 23, 1999
NRC:99:054

Document Control Desk
ATTN: Chief, Planning, Program and Management Support Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Request for Review of EMF-2157(P) Revision 0, "Boiling Water Reactor Licensing Methodology Compendium"

Ref.: 1. Memorandum, Egan Wang (NRR/DRPM/PGEB) to Cynthia A. Carpenter (NRR/DRIP/RGEB), "Summary of Meeting Held on May 18, 1999 with Siemens to Discuss Issues Related to Potential Submittal of BWR Licensing Methodology Compendium," May 27, 1999.

Fifteen proprietary and 12 nonproprietary copies of topical report EMF-2157(P) Revision 0, "Boiling Water Reactor Licensing Methodology Compendium," are being submitted to the NRC for review and acceptance for referencing in licensing actions. (NOTE: Three proprietary copies and one nonproprietary copy have been sent directly to Mr. N. Kalyanam).

This topical report is a compendium of SPC methodologies and design criteria which are described in topical reports that the NRC has found acceptable for referencing in BWR licensing applications. The report provides a concise, organized source for BWR topical reports. It presents information about the application of each topical report, the associated SER conclusions and restrictions, and the relationships among the topical reports. Upon approval by the NRC, the compendium is expected to be used by licensees as the sole reference to generically-approved methods in both the technical specifications and the COLR.

During a meeting on May 18, 1999 (see Reference 1), the NRC expressed some reservation about the value of obtaining approval of such a topical report but suggested that we submit the report for review and discussion. After a preliminary review, the NRC said it would determine, in consultation with SPC, whether formal approval of the report would be beneficial to all interested parties (the NRC, SPC, and SPC's licensees).

SPC requests that a preliminary review of the topical report be conducted and that a discussion be held with SPC by March 15, 2000, so that a timely decision can be made on whether to proceed with the review and approval process.

Because this report relies on numerous other topical reports, revisions will be needed whenever one of the referenced reports is revised or replaced. SPC plans to make revisions by providing change pages that are marked to clearly reflect the changes made and the date of submittal. This revision technique will facilitate the NRC's review and will minimize the revision effort.

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6. The following criteria are customarily applied by SPC to determine whether information should be classified as proprietary:

- (a) The information reveals details of SPC's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for SPC.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for SPC in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by SPC, would be helpful to competitors to SPC, and would likely cause substantial harm to the competitive position of SPC.

7. In accordance with SPC's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside SPC only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. SPC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

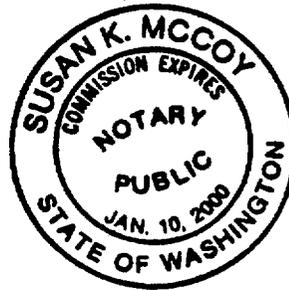
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

[Handwritten Signature]

SUBSCRIBED before me this 23rd
day of December, 1999.

[Handwritten Signature]

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 01/10/00



Siemens Power Corporation considers some of the information contained in this topical report to be proprietary. As required by 10 CFR 2.790(b), an affidavit is enclosed to support the withholding of this information from public disclosure.

Very truly yours,



James F. Mallay, Director
Regulatory Affairs

/arn

Enclosures

cc: R. Caruso
N. Kalyanam (w/Enclosures)
J. S. Wermiel
Project No. 702 (w/Enclosures)