



April 20, 2000

PSLTR: #00-0075

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington DC 20555

Dresden Nuclear Power Stations Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR 25
NRC Docket Nos. 50-237 and 50-249

Subject: Withholding Information from Public Disclosure

- Reference:
- 1) NRC letter from L.W. Rossbach to O. D. Kingsley (ComEd), "Dresden-Request for Withholding Information from Public Disclosure," dated March 16, 2000.
 - 2) ComEd letter from J.H. Heffley to US NRC," Proposed Technical Specification Change Surveillance Test Intervals and Allowed Outage Times for Protective Instrumentation," dated January 11, 2000

Reference 1 requested that Commonwealth Edison (ComEd) Company review the information contained in Reference 2, Technical Specification Change Request, to determine if the correct information was requested to be withheld from public disclosure in accordance with 10 CFR 2.790, "Public inspections, exemptions and requests for withholding."

Our Technical Specification change requested that the proprietary information contained in Attachment E of the letter be withheld from public disclosure. The information designated as proprietary by the General Electric (GE) Company was denoted by bars or brackets. The title page to Attachment E also indicated that proprietary information was contained in the attachment but did not clearly indicate that only the proprietary information (i.e., information denoted by bars or brackets) is requested to be withheld from public disclosure.

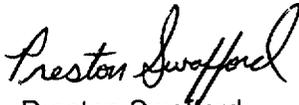
In response to the NRC's questions regarding the information requested by GE to be withheld, GE has provided information supporting the requested withholding in accordance with 10 CFR 2.790. This information is included as Attachment 1 to this letter and was discussed with Mr. L. W. Rossbach, NRC Project Manager, on April 10, 2000. Attachment 2 to this letter provides copies of the information originally included as Attachment E to our Technical Specification change request with the proprietary information redacted.

ACCI 4/11

April 20, 2000
U.S. Nuclear Regulatory Commission
Page 2

Should you have any questions regarding this information, please contact Mr. D.F. Ambler, Regulatory Assurance Manager at (815) 942-2920 extension 3800.

Respectfully,



Preston Swafford
Site Vice president
Dresden Nuclear Power Station

- Attachments: 1. Letter from D.J. Robere (GE) to J.V. Sipek, (ComEd) "Dresden-
dated April 11, 2000.
2. Redacted Versions of General Electric Site Specific Evaluations.

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety



April 11, 2000

Mr. Joseph Sipek
Regulatory Services
Commonwealth Edison Company
1400 Opus Place
Downer's Grove, IL
60515-5701

Subject: Dresden – Request for Withholding Information from Public Disclosure
(TAC Nos. MA7984 and MA 7985)

Reference: US NRC letter of March 16, 2000 to Mr. Oliver D. Kingsley, same
subject

Dear Mr. Sipek,

The referenced NRC letter states that “a sampling review of the information delineated as proprietary by bars in Section 3 of report GE-NE E11-00084-01-01 indicates that much of the introductory information in the Section 3 subsections is available in publicly available information such as the Updated Final Safety Analysis Report” and that “Consequently, we are unable to conclude at this time that the information referenced in the affidavit is proprietary.”

GE reaffirms that the proprietary information in these (2) reports is appropriately identified and requests ComEd to respond to the NRC, as follows, proposing NRC withholding in accordance with 10CFR2.790.

GE developed a detailed PRA model for the RPS and ECCS systems to provide risk-based justification for the STI/AOT relaxation. The models were representative of certain types of BWRs. The generic models were developed based on significant in-house information available at GE and failure data not commonly available at that time. These generic model were identified as proprietary in the original reports (NEDC-30851P& NEDC-30936P) and SERs were issued based upon these proprietary reports. These reports and models represent significant commercial value to GE and therefore continue to be identified as proprietary information.

Subsequent to the issuance of the original report, a number of BWR owners have asked GE to prepare a plant-specific report for the RPS and ECCS. In these reports, as in the case of the Dresden reports in question, GE compares the plant-specific design features to those modeled in the generic model and draws conclusions on the applicability of the conclusions of the original report for the plant in question. Such conclusions are significantly more difficult (more resource intensive) to reach in the absence of the original model. The results of the comparisons also are proprietary because there are many unique features of each plant.

The items classified as proprietary in the reports represent:

- a) Judgement of GE as to a specific difference between the generic model and the plant-specific design being significant (or insignificant).
- b) The impact of significant plant-specific differences on the results obtained from the generic model.
- c) Final results and conclusions.

The Section 3 information contains the results of an evaluation of differences between the plant-specific features and the generic proprietary models developed by General Electric Company. The availability of such information, such as of design features for a particular BWR plant, in the UFSAR would still not render such information utilized in the evaluation non-proprietary. Each such evaluation involves comparison against a proprietary model and comparison to reliability assessments contained in a proprietary report, and therefore we believe that the resulting Section 3 information is indeed proprietary to General Electric.

Please let me know if you have any questions or comments concerning this request.

Sincerely,



David J. Robare
Technical Account Manager
GE Nuclear Energy
(408) 925-3141
