

April 27, 2000

Mr. C. Lance Terry
TXU Electric
Senior Vice President &
Principal Nuclear Officer
Attn: Regulatory Affairs Department
P. O. Box 1002
Glen Rose, Texas 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - REVISED
LARGE BREAK LOSS OF COOLANT ACCIDENT ANALYSIS METHODOLOGY
(TAC NOS. MA8656 AND MA8657)

Dear Mr. Terry:

By your application dated April 13, 2000, and affidavit dated March 24, 2000, executed by Jerald S. Holm, Manager, Product Licensing for Siemens Power Corporation (SPC), you submitted SPC Topical Report ERX-2000-002-P (proprietary), "Revised Large Break Loss of Coolant Accident Analysis Methodology," and requested that it be withheld from public disclosure pursuant to 10 CFR 2.790. A nonproprietary version, ERX-2000-002-NP, was submitted for placement in the U.S. Nuclear Regulatory Commission's (NRC) public document room.

The affidavit stated that Topical Report ERX-2000-002-P should be considered exempt from mandatory public disclosure based on the following criteria:

- (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.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.790 and, on the basis of your statements, 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 2.790(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.

Sincerely,

/RA/

David H. Jaffe, Senior Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

cc: See next page

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.790 and, on the basis of your statements, 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 2.790(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

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Sincerely,
/RA/

David H. Jaffe, Senior Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

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