



COMBUSTION ENGINEERING OWNERS GROUP

Arizona Public Service Co.  
Palo Verde 1, 2, 3

CE Nuclear Power LLC

Entergy Operations, Inc.  
ANO 2 WSES Unit 3

Korea Electric Power Corp.  
YGN 3, 4 Ulchin 3, 4

Omaha Public Power District  
Ft. Calhoun

Baltimore Gas & Electric  
Calvert Cliffs 1, 2

Consumers Energy Co.  
Palisades

Florida Power & Light Co.  
St. Lucie 1, 2

Northeast Utilities Service Co.  
Millstone 2

Southern California Edison  
SONGS 2, 3

July 7, 2000  
CEOG-00-191

NRC Project 692

Document Control Desk  
US Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Subject: Transmittal CE Owners Group Report, "Model for Failure of RCP  
Seals Given Loss of Seal Cooling" CE NPSD-1199-P, July 2000  
(Contains Proprietary Information)**

The purpose of this letter is to transmit the subject report prepared by the Combustion Engineering Owners Group (CEOG). This report is provided as a result of meetings with the NRC on July 14 and December 13, 1999, and is submitted for information, not for staff review and approval.

CE NPSD-1199 presents a mechanistic methodology for estimating the probability of failure of a RCP seal given a loss of cooling to the seals. The model presented in the report provides (1) a technical description of the seals used at CE plants, (2) a description of the failure mechanisms, (3) a quantification of a mechanistic seal model, and (4) a definition of the expected leakage rates for combination of seal stage failures. Enclosed for staff information are 15 proprietary and 12 non-proprietary copies of the subject report.

Information contained in CE NPSD-1199-P has been determined by CENP to be proprietary in nature. It is requested that this information be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and be appropriately safeguarded. The reasons for the classification of this information as proprietary are delineated in the enclosed affidavit.

If you have any questions or comments, please contact me, or Mr. Gordon Bischoff, the CEOG Project Director, at 860-285-5494.

Sincerely,

Ralph Phelps  
Chairman, CE Owners Group

DOT 7 1/11 NP  
1/14 PMP

Enclosures: Proprietary Affidavit  
CE NPSD-1199-P (14 copies)  
CE NPSD-1199-NP (11 copies)

cc: CE Owners Group w/o  
CEOG Licensing Subcommittee w/o  
CEOG PSA Subcommittee w/o  
Mr. John S. Cushing, USNRC w/1 copy  
Mr. Gordon C. Bischoff, Westinghouse w/o

### **C-E OWNERS GROUP MANAGEMENT COMMITTEE**

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Y. Khalil, NU (Berlin)	R. Schneider, <u>W</u> , (Windsor)
M. Lloyd, EO - ANO (Russellville)	

I, Ian C. Rickard, depose and say that I am the Director, Nuclear Licensing, of C-E Nuclear Power LLC (CENP), duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and described below.

I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information. I have personal knowledge of the criteria and procedures utilized by CENP in designating information as a trade secret, privileged, or as confidential commercial or financial information.

The information for which proprietary treatment is sought, and which document has been appropriately designated as proprietary, is contained in the following:

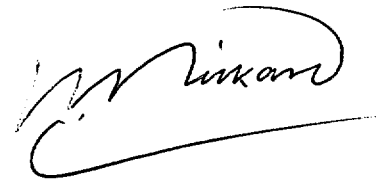
- ***CE NPSD-1199-P, "Model for Failure of RCP Seals Given Loss of Seal Cooling," July 2000***

Pursuant to the provisions of Section 2.790(b)(4) of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information included in the document listed above should be withheld from public disclosure.

1. The information sought to be withheld from public disclosure is owned and has been held in confidence by CENP. It consists of information concerning the methodology for estimating the probability of failure of a RCP seal given a loss of cooling to the seals.
2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to CENP.
3. The information is of a type customarily held in confidence by CENP and not customarily disclosed to the public.
4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.
5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements that provide for maintenance of the information in confidence.
6. Public disclosure of the information is likely to cause substantial harm to the competitive position of CENP because:
  - a. A similar product is manufactured and sold by major competitors of CENP.
  - b. Development of this information by CENP required thousands of dollars and hundreds of manhours of effort; a competitor would have to undergo similar expense in generating equivalent information.

- c. The information consists of (1) a technical description of the seals used at CE plants, (2) a description of the failure mechanisms, (3) a quantification of a mechanistic seal model, and (4) a definition of the expected leakage rates for combination of seal stage failures. Application of this failure model provides CENP a competitive economic advantage. The availability of such information to competitors would enable them to modify their products to better compete with CENP, take marketing or other actions to improve their product's position or impair the position of CENP's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- d. In pricing CENP's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of CENP's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.
- e. Use of the information by competitors in the international marketplace would increase their ability to market engineering services by reducing the costs associated with their technology development.

Sworn to before me this  
7<sup>th</sup> day of July, 2000



Ian C. Rickard  
Director, Nuclear Licensing

Catherine P. McCarthy  
Notary Public

My commission expires: 1/31/03