



Westinghouse Electric Company
CE Nuclear Power LLC

2000 Day Hill Road
Windsor, CT 06095
USA

30 August, 2000
LD-2000-0046

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

**SUBJECT: Revision to CE Nuclear Power LLC ECCS Performance Appendix K
Evaluation Model
(Enclosure 1 Contains Proprietary Information)**

Reference(s): 1) CENPD-132, Supplement 4-P, Revision 1, "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model", August 2000
2) Letter, I. C. Rickard (CE) to USNRC Document Control Desk, "Revision to ABB CENP ECCS Performance Appendix K Evaluation Model", LD-99-026, April 30, 1999
3) Letter, I. C. Rickard (CE) to USNRC Document Control Desk, "ABB CENP Response to NRC Request for Additional Information Regarding CENPD-132, Supplement 4-P", LD-2000-0011, February 22, 2000
4) Letter, J. S. Cushing (NRC) to I. C. Rickard (CE), "Request for Additional Information (RAI) Regarding CENPD-132, Supplement 4-P (TAC No. MA5660)", December 4, 1999

CE Nuclear Power LLC (CE) herewith submits fifteen (15) copies of proprietary topical report CENPD-132, Supplement 4-P, Revision 1, "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model" (Reference 1), for Nuclear Regulatory Commission (NRC) review and acceptance. This topical report revision supercedes in its entirety CENPD-132, Supplement 4-P submitted on April 30, 1999 (Reference 2).

Note, during the period between the submittal of Reference 2 and this submittal of Revision 1 to the topical report, the original submitting company has undergone a name change. ABB CE Nuclear Power has become CE Nuclear Power LLC, a subsidiary of Westinghouse Electric Company LLC.

CENPD-132, Supplement 4-P, Revision 1 contains changes resulting from the following actions:

- Incorporation of responses (Reference 3) regarding the formal Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI), Reference 4.
- Incorporation of responses regarding informal clarification discussions with the NRC reviewer.
- Incorporation of CE Nuclear Power initiated improvements to user information pertaining to the content and usage of the Automated/Integrated Code System.
- Change to corporate identity.

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1/15*

CE Nuclear Power LLC has determined that CENPD-132, Supplement 4-P, Revision 1 (Enclosure 1) contains information that is proprietary in nature. Consequently, it is requested that the topical report be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and that these copies be appropriately safeguarded. The reasons for the classification of this information as proprietary are delineated in the affidavit provided in Enclosure 2.

If you have any questions regarding this matter, please do not hesitate to call Chuck Molnar of my staff at (860) 285-5205.

Very truly yours,
CE NUCLEAR POWER LLC

A handwritten signature in black ink, appearing to read "Philip W. Richardson", written over a horizontal line.

Philip W. Richardson, Manager
Windsor Nuclear Licensing

Enclosure(s): As stated

xc: J. S. Cushing (w/o enclosure, NRC)
S. Dembek (w/o enclosure, NRC)
Y. Hsii (w/enclosure, NRC)
J. S. Wermiel (w/o enclosure, NRC)

**CE NUCLEAR POWER LLC
PROPRIETARY INFORMATION**

CE NUCLEAR POWER LLC

**CENPD-132, SUPPLEMENT 4-P, REVISION 1
CALCULATIVE METHODS FOR THE CE NUCLEAR POWER
LARGE BREAK LOCA EVALUATION MODEL**

August 2000

**CE NUCLEAR POWER LLC
PROPRIETARY INFORMATION**

CE NUCLEAR POWER LLC

**CENPD-132, SUPPLEMENT 4-P, REVISION 1
CALCULATIVE METHODS FOR THE CE NUCLEAR POWER
LARGE BREAK LOCA EVALUATION MODEL**

PROPRIETARY AFFIDAVIT

AFFIDAVIT PURSUANT TO 10 CFR 2.790

I, Philip W. Richardson, depose and say that I am the Manager, Windsor Nuclear Licensing, of CE 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 referenced in the paragraph immediately 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.

The information for which proprietary treatment is sought is contained in the following document:

CENPD-132, Supplement 4-P, Revision 1, "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model", August 2000

This document has been appropriately designated as proprietary.

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. Pursuant to the provisions of 10 CFR 2.790(b)(4) of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

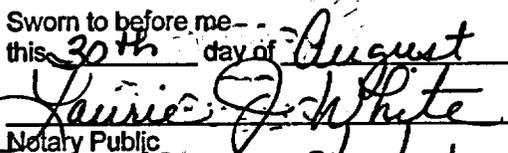
1. The information sought to be withheld from public disclosure, is owned and has been held in confidence by CENP. It consists of the methodology for the evaluation of LOCA pursuant to 10 CFR 50, Appendix K, comparisons to experimental data for model verification and comparison to the previously approved methodology.
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. CENP has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence.
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 which 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 pressurized water reactor competitors of CENP.
 - b. Development of this information by CENP required hundreds of thousands of dollars and thousands of man-hours of effort. A competitor would have to undergo similar expense in generating equivalent information.
 - c. In order to acquire such information, a competitor would also require considerable time and inconvenience to develop methodology for the evaluation of LOCA pursuant to 10 CFR 50, Appendix K, comparisons to experimental data for model verification and comparison to the previously approved methodology.
 - d. The information consists of methodology for the evaluation of LOCA pursuant to 10 CFR 50, Appendix K, comparisons to experimental data for model verification and comparison to the previously approved methodology, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product 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.
 - e. 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.
 - f. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on CENP's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.



Philip W. Richardson
Manager, Windsor Nuclear Licensing

Sworn to before me
this 30th day of August, 2000


Notary Public

My commission expires: 8/31/04



CE NUCLEAR POWER LLC

DOCUMENT DISTRIBUTION/APPROVAL

Project Number:	2009503	Originator:	C. M. Molnar	Initials:	CMM <i>CMM</i>
Project Name:	Large Break LOCA '99 Evaluation Model				
Document Number:	LD-2000-0046	Rev:	000	Quality Record?	
Document Title:	Revision to CE Nuclear Power LLC ECCS Performance Appendix K Evaluation Model			No <input type="checkbox"/> Yes (See note below) <input checked="" type="checkbox"/>	
				Quality Record Retention Period (see QP 17.1):	
Transmittal Reason:	Provide subject information to the NRC.				
Reference:	See attached letter.				

Name	Title	CEP Code	w / Encl.		Approval Required		Signature	Date
			Y	N	Y	N		
P. W. Richardson			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
C. B. Brinkman		Rockville, MD	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
M. J. Sancarz			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>M. J. Sancarz</i>	8/29/00
E. F. Jageler			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>E. F. Jageler</i>	8/29/00
D. M. Cleary			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
R. J. Espinosa			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
P. K. Doherty			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
N. E. Lee			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
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Licensing File			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Comments

++EDMS will make future distributions of CENPD-132, Supplement 4-P, Revision 1.

Note: This form must include the attached document when designated a Quality Record.