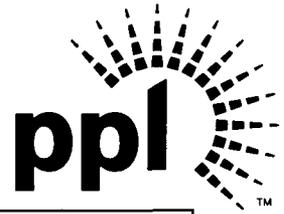


**William H. Spence**  
President and Chief Nuclear Officer

**PPL Susquehanna, LLC**  
769 Salem Boulevard  
Berwick, PA 18603  
Tel. 610.774.3683 Fax 610.774.5019  
Whspence@pplweb.com



MAY 12 2009

**Submitted pursuant  
to 10 CFR 2.390**

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION  
UNIT 1 OPERATING LICENSE NO. NPF-14  
LICENSE CONDITION 2.C.(36)(b)8 AND  
UNIT 2 OPERATING LICENSE NO. NPF-22  
LICENSE CONDITION 2.C.(20)(b)8  
PLA-6510**

**Docket Nos. 50-387  
and 50-388**

*References: 1) PLA- 6351, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC),  
"Susquehanna Steam Electric Station Unit 1 Operating License No: NPF-14  
License Conditions 2.C.(36)(b)8 and 2.C.(36)(c)," dated April 21, 2008.*

*2) PLA-6506, Mr. W. H. Spence (PPL) to Document Control Desk (USNRC),  
"Susquehanna Steam Electric Station Unit 2 Operating License No. NPF-22  
License Conditions 2.C.(20)(b)8 and 2.C.(20)(c)," dated May 14, 2009.*

Susquehanna SES (SSES) Unit 1 License Condition (LC) 2.C.(36)(b)8 and  
Unit 2 LC 2.C.20(b)8 state:

"PPL shall submit flow-induced vibration related portions of the CPPU startup test procedure to the NRC, including methodology for updating the limit curve, prior to initial power ascension above 3489 MWt."

The purpose of this letter is to provide the remaining information, related to the methodology for updating the limit curve using main steam line strain gauge data, which is necessary to complete these SSES Units 1 and 2 license conditions. References 1 and 2 previously submitted the flow-induced vibration portions of the CPPU startup test procedure required by these license conditions.

The information included herein contains proprietary and non-proprietary versions of the GE Hitachi Nuclear Energy (GEH) Engineering Report entitled "Main Steam Line Limit Curve Adjustment During Power Ascension."

ADD  
ARR

Enclosure 1 contains the proprietary version of the GEH report, and Enclosure 2 contains the non-proprietary version of the GEH report. This report provides the process steps for resolving discrepancies in which frequency peaks exceed the limit curve for MSL strains, and the process for updating the SSES Unit 1 and 2 MSL limit curves during power ascension testing.

The information contained in Enclosure 1 is proprietary as defined by 10 CFR 2.390. GEH as the owner of the proprietary information, has executed the enclosed affidavit, which identifies that the enclosed proprietary information has been handled and classified as proprietary, is customarily held in confidence, and has been withheld from public disclosure. The proprietary information was provided to PPL in a GEH transmittal that is referenced by the affidavit. The proprietary information has been faithfully reproduced in the enclosed information such that the affidavit remains applicable. PPL hereby requests that the enclosed GEH proprietary information be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17.

The header of each page in Enclosure 1 carries the notation "GEH Proprietary Information" GEH proprietary information is identified by a dotted underline inside double square brackets. [[This sentence is an example.<sup>{3}</sup>]] In all cases, the superscript notation<sup>{3}</sup> refers to Paragraph (3) of the GEH affidavit, which provides the basis for the proprietary determination. Specific information that is not so marked is not GEH proprietary.

Enclosure 3 contains the signed GEH affidavit associated with the proprietary report.

If you have any questions or require additional information, please contact Mr. Duane L. Filchner at (610) 774-7819.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 5/12/09

  
W.H. Spence

Enclosure 1 – Proprietary Version - “Main Steam Line Limit Curve Adjustment During Power Ascension”

Enclosure 2 – Non-Proprietary Version – “Main Steam Line Limit Curve Adjustment During Power Ascension”

Enclosure 3 – Affidavit

Copy: NRC Region I  
Mr. R. R. Janati, DEP/BRP  
Mr. F. W. Jaxheimer, NRC Sr. Resident Inspector  
Mr. B. K. Vaidya, NRC Project Manager

---

**Enclosure 3 to PLA-6510**

**Affidavit**

---

# GE-Hitachi Nuclear Energy Americas LLC

## AFFIDAVIT

I, **James F. Harrison**, state as follows:

- (1) I am Vice President, Fuels Licensing, Regulatory Affairs, GE-Hitachi Nuclear Energy Americas LLC (“GEH”). I have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) The information sought to be withheld is contained in GEH Engineering Report 0000-0101-0766-P-R0, “Main Steam Line Limit Curve Adjustment During Power Ascension,” Class III (GEH Proprietary Information), April 2009. GEH proprietary information text in 0000-0101-0766-P-R0 is identified by a dark red dotted underline inside double square brackets [[This sentence is an example.<sup>[3]</sup>]]. Figures and large equation objects containing GEH proprietary information are identified with double square brackets before and after the object. In each case, the superscript notation <sup>[3]</sup> refers to Paragraph (3) of this affidavit, which provides the basis for the proprietary determination.
- (3) In making this application for withholding of proprietary information of which it is the owner or licensee, GEH relies upon the exemption from disclosure set forth in the Freedom of Information Act (“FOIA”), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), and 2.390(a)(4) for “trade secrets” (Exemption 4). The material for which exemption from disclosure is here sought also qualify under the narrower definition of “trade secret”, within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).
- (4) Some examples of categories of information which fit into the definition of proprietary information are:
  - a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by GEH's competitors without license from GEH constitutes a competitive economic advantage over other companies;
  - b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product;
  - c. Information which reveals aspects of past, present, or future GEH customer-funded development plans and programs, resulting in potential products to GEH;
  - d. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs (4)a. and (4)b. above.

- (5) To address 10 CFR 2.390(b)(4), the information sought to be withheld is being submitted to NRC in confidence. The information is of a sort customarily held in confidence by GEH, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GEH, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.
- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge, or subject to the terms under which it was licensed to GEH. Access to such documents within GEH is limited on a "need to know" basis.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist, or other equivalent authority for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside GEH are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
- (8) The information identified in paragraph (2) above is classified as proprietary because it contains detailed results and conclusions regarding supporting evaluations of the safety-significant changes necessary to demonstrate the regulatory acceptability of the "Engineering Report for Main Steam Line Limit Curve Adjustment During Power Ascension" for a GEH Boiling Water Reactor ("BWR") steam dryer. The analysis utilized analytical models and methods, including computer codes, which GEH has developed, obtained NRC approval of, and applied to perform evaluations for a GEH BWR steam dryer.

The development of the evaluation process along with the interpretation and application of the analytical results is derived from the extensive experience database that constitutes a major GEH asset.

- (9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to GEH's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of GEH's comprehensive BWR safety and technology base, and its commercial value extends beyond the original development cost.

The value of the technology base goes beyond the extensive physical database and analytical methodology and includes development of the expertise to determine and apply the appropriate evaluation process. In addition, the technology base includes the value derived from providing analyses done with NRC-approved methods.

The research, development, engineering, analytical and NRC review costs comprise a substantial investment of time and money by GEH.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

GEH's competitive advantage will be lost if its competitors are able to use the results of the GEH experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to GEH would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive GEH of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing and obtaining these very valuable analytical tools.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information, and belief.

Executed on this 29th day of April 2009.

A handwritten signature in black ink that reads "James F. Harrison". The signature is written in a cursive style with a large initial "J" and "H".

James F. Harrison  
Vice President, Fuels Licensing, Regulatory Affairs  
GE-Hitachi Nuclear Energy Americas LLC

---

**Enclosure 2 to PLA-6510**

**Non - PROPRIETARY VERSION**

**“Main Steam Line Limit Curve Adjustment  
During Power Ascension”**

---

**GE-Hitachi Nuclear Energy Americas LLC**

**ENCLOSURE 2**

**GEH Engineering Report, Main Steam Line Limit Curve  
Adjustment During Power Ascension, 0000-0101-0766-NP-R0 -  
Non-Proprietary Version**

**IMPORTANT NOTICE**

This is a non-proprietary version of 0000-0101-0766-P-R0, which has the proprietary information removed. Portions of the document that have been removed are indicated by white space with an open and closed bracket as shown here [[ ]].