

EBASCO

R. C. IOTTI
Senior Vice President

January 25, 1993

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington D.C. 20555

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

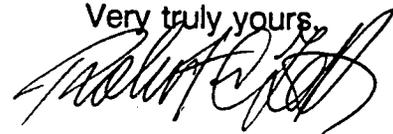
Subject: IP3-RPT-RPC-00357, "Instrument Drift Analysis for Indian Point 3 Reactor Protection System" (Proprietary)

Dear Sir:

The attached 3 page discussion on calibration extensions and the New York Power Authority Report No. IP3-RPT-RPC-00357 contains information proprietary to Ebasco Services Inc. This information is being used by the New York Power Authority to support technical specification changes for the Indian Point 3 Reactor Protection System. In accordance with the requirements of 10CFR2.790, of the Commission's regulations, enclosed is an affidavit requesting that this information be withheld from public disclosure. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission.

Correspondence with respect to this application for withholding or the accompanying affidavit should be addressed to the undersigned.

Very truly yours,



9302260252 930218
PDR ADOCK 05000286
P PDR

EBASCO SERVICES INCORPORATED

TWO WORLD TRADE CENTER • NEW YORK, N.Y. 10048-0752 • (212) 839-1080

bc: E J Borella w/att

Ebasco Services, Inc.

AFFIDAVIT

I, Dr Robert C Iotti, being duly sworn, depose and state as follows:

1. I am Senior Vice President, Ebasco Services, Inc., hereinafter known as Ebasco, and 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 New York Power Authority Report IP3-RPT-RPC-00357, "Instrument Drift Analysis for Indian Point 3 Reactor Protection System," dated November, 1992, prepared by Ebasco Services. The Ebasco Proprietary portions of this report are identifiable by the "Proprietary Information" designation at the top of the page.
3. I have personal knowledge of the criteria and procedures utilized by Ebasco Services, Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.
4. Pursuant to the provisions of paragraph (b) (4) of Section 2.790 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 should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Ebasco.
 - (ii) The information is of a type customarily held in confidence by Ebasco and not customarily disclosed to the public.

Some examples of categories of information which fit into the definition of Proprietary Information are:

- a. Information that discloses a process, method or apparatus where prevention of its use by Ebasco's competitors without license from Ebasco constitutes a competitive economic advantage over other companies;

Ebasco Services, Inc.

AFFIDAVIT

- b. Information consisting of supporting data and analyses, including test data, relative to a process, method or apparatus, the application of which provide a competitive economic advantage, e.g., by optimization or improved marketability;
 - c. Information which if used by a competitor, would reduce his expenditures of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product;
 - d. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of Ebasco, its customers or suppliers;
 - e. Information which reveals aspects of past, present or future Ebasco customer-funded development plans and programs of potential commercial value to Ebasco;
 - f. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
 - g. Information which Ebasco must treat as proprietary according to agreements with other parties.
5. The document mentioned in paragraph 2 above has been evaluated in accordance with the above criteria and procedures and has been found to contain information which is proprietary and which is customarily held in confidence by Ebasco.
6. The information to the best of my knowledge and belief has consistently been held in confidence by Ebasco Services, Inc., has been transmitted to the Commission in confidence, is not available in public sources, and no public disclosure has been made.
7. Public disclosure of the information sought to be withheld is likely to cause substantial harm to the competitive position of Ebasco Services, Inc. and deprive or reduce the availability of profit making opportunities. A substantial effort has been expended by Ebasco to develop this information.

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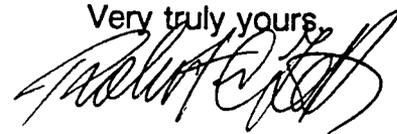
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AFFIDAVIT

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PROPRIETARY INFORMATION

Calibration Extension Program

The calibration extension program involves plant specific drift evaluations, loop accuracy/setpoint calculations and instrument system evaluations. These calculations and evaluations provide the technical basis for extending calibration intervals to accommodate a 24 month operating cycle. The approach taken in evaluating calibration extensions meets the requirements of Enclosure 2 to NRC Generic Letter 91-04.

Enclosed with this attachment is the Indian Point 3 Instrument Drift Analysis for Reactor Protection System (RPS) circuits. Loop accuracy/setpoint calculations for reactor trip on reactor coolant flow, 6.9 kV underfrequency, and steam generator low level are included in Attachment IV. The RPS Instrument Drift Analysis and the loop accuracy/setpoint calculations are representative of the work performed by the calibration extension program and show that the program:

- 1) uses accepted practices for developing loop accuracy calculations,
- 2) uses appropriate statistical models in analyzing past instrument performance, and
- 3) appropriately interprets and applies statistical analyses results to obtain a high confidence level in protection system performance within the context of extended surveillance intervals.

Below is a summary description of the instrument drift analysis methodology and the interrelationship with loop accuracy/setpoint calculations. As previously stated, representative loop accuracy/setpoint calculations are provided in Attachment IV.

Instrument Drift Analysis Methodology

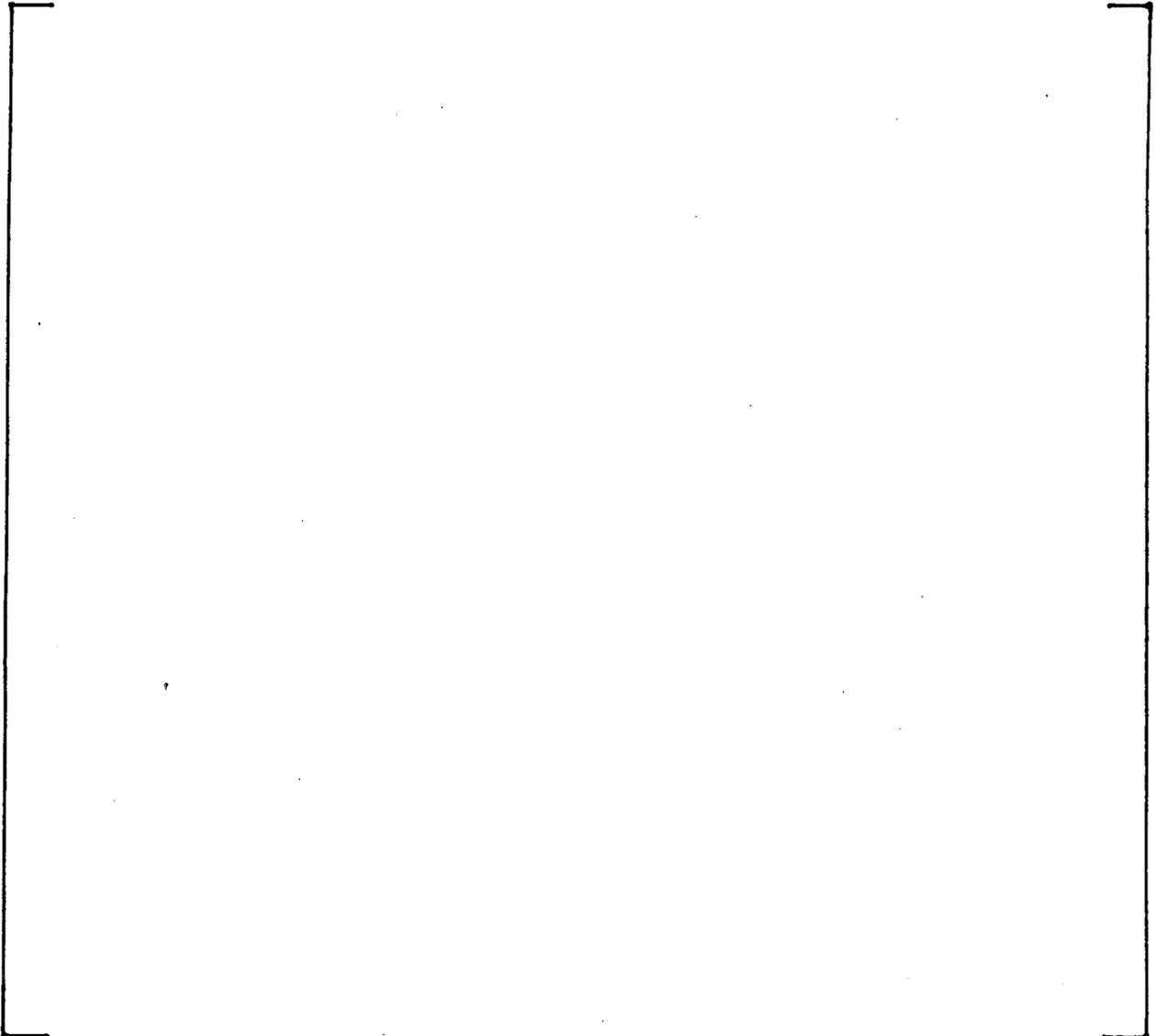
Field calibration data for RPS components currently calibrated once every 18 (plus 25% for a maximum of 22.5) months was evaluated to assess the acceptability of extending the component's calibration interval to 24 (plus 25% for a maximum of 30) months. The instrument drift evaluation (IDE) for these RPS components is comprised of two phases. Phase 1 compares past instrument performance to theoretical acceptance limits (vendor drift allowance, VDA, or calibration tolerance, CT). Phase 2 predicts future drift by statistically extrapolating the component's derived drift data to arrive at a value for maximum expected drift over a 30 month interval (MED30).

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PROPRIETARY INFORMATION

Phase 1 - Assessment of Past Performance

Past performance is indicated by instrument "drift," which is derived from field calibration data by taking the absolute value of the difference between the "as-found" and "as-left" calibration values. The derived value actually encompasses instrument accuracy, measuring and test equipment uncertainties, and the effects of ambient environmental conditions (temperature, pressure, humidity, and radiation) in addition to instrument drift. Therefore, the term "drift" that is used throughout this attachment and in the enclosed Instrument Drift Analysis for the Reactor Protection System is a misnomer and actually represents total instrument calibration uncertainties.



PROPRIETARY INFORMATION



Phase 2 - Predicted Future Performance

The second phase of the IDE predicts future instrument drift. Future instrument drift with a 95% probability at a 95% confidence level is calculated from field calibration data.



Loop Accuracy/Setpoint Calculations

A loop accuracy calculation for the instrument channel is then performed using the most conservative values for 30 month calibration uncertainties (vendor specified uncertainties or MED30, whichever is larger). The loop accuracy/setpoint calculations must show that sufficient margin exists between the analytical limit and the existing field trip setting in order to be consistent with the assumptions of the safety analysis. The calculations also verify whether technical specification setpoint limits provide sufficient margin over the analytical limit to allow for instrument inaccuracies.

PROPRIETARY INFORMATION

The results of the loop accuracy/setpoint calculation hold the greatest weight in determining whether a calibration interval can be safely extended or not. If the loop accuracy/setpoint calculations indicate that sufficient margin exists and the assumptions of the safety analysis are not violated, reasonable assurance exists that the calibration interval may be extended.

The attached loop accuracy/setpoint calculations demonstrate the various methods for applying 30 month calibration uncertainties to overall loop accuracies.

INSTRUMENT DRIFT ANALYSIS FOR REACTOR PROTECTION SYSTEM

(NON-PROPRIETARY VERSION*)

*Proprietary Information has been omitted