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MANGAN, C.V.	Niagara Mohawk Power	Corp.				
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SCHEWNCER, A.	Licensing Branch 2	2				
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SUBJECT: Forwards supplmental info requested by Wescott re effects of PMP at facility.Info provided to close out SER Open Item 4.Also forwards proprietary calculations.Calculations withheld (ref 10CFR2.790).

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NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

November 30, 1984 (NMP2L 0270)

Mr. A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20555

Dear Mr. Schwencer:

Re: Nine Mile Point Unit 2 Docket No. 50-410

Enclosed for your use and information is an additional response as requested by Mr. Wescott, of your staff, regarding the effects of the probable maximum precipitation at Nine Mile Point Unit 2. This information is being provided to supplement previous information to close out SER Open Item No. 4.

The calculations provided in this submittal are considered by their preparer, Stone & Webster Engineering Corporation, to include calculation techniques exempt from public disclosure under the provisions of Section 2.790(a)(4) of the Commission's Regulations. Accordingly, we are submitting herewith an Application for Withholding of Proprietary Information from Public Disclosure, pursuant to the provisions of Section 2.790(b)(1) of the Commission's Regulations.

Very truly yours,

american

C. V. Mangan Vice President Nuclear Engineering & Licensing

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of

Niagara Mohawk Power Corporation

Docket No. 50-410

(Nine Mile Point Unit 2)

AFFIDAVIT

C. V. Mangan , being duly sworn, states that he is Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of <u>Prevaluer</u>, 1984.

Public in and for huleaa County, New York

My Commission expires: JANIS M. MACRO

Notary Public in the State of New York Qualified in Ononcara County (10, 4774253 My Commission Expires March 30, 1902.....

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UNITED STATES

NUCLEAR REGULATORY COMMISSION

In the Matter of Niagara Mohawk Power Corporation (Nine Mile Point Unit 1)

Docket No. 50-220

APPLICATION FOR WITHHOLDING

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PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE

Pursuant to Section 2.790(b)(1) of the Regulations of the Nuclear Regulatory Commission, 10CFR 2.790(b)(1), Niagara Mohawk Power Corporation hereby makes application to withhold from public disclosure the attached calulations, which contain calculation techniques considered by Stone and Webster Engineering Corporation to be trade secrets exempt from public disclosure under the provisions of Section 2.790(a)(4) of the Commission's Regulations 10CFR 2.790(a)(4).

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In support of this Application, enclosed herewith is an Affidavit containing a full statement of the reasons for this request for withholding from public disclosure executed by William C. Drottleff, Vice President of Stone and Webster Engineering Corporation.

WHEREFORE, Niagara Mohawk Power Corporation respectfully requests that said proprietary information be withheld from public disclosure.

Corporation V. Mangan C. Vice President Nuclear Engineering & Licensing

Signed and sworn to before me this 30 day of 1 1984 onembe

Notary Public

"JANIS M. MACRO Notary Public In the State of New York Qualified In Onondaga County No. 476-555 My Commission Expires March 30, 199

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State of New Jersey) County of Camden)

SS.

I, William C. Drotleff, being duly sworn according to law, depose and say. I am Vice President of Stone & Webster Engineering Corporation (SWEC) and that:

- 1. For the reasons listed below the material being submitted to the NRC in response to the draft Safety Evaluation Report open item 4 which is being filed by Niagara Mohawk Power Corporation in connection with its license application for Nine Mile Point - Unit 2, Docket No. 50-410 contains information containing trade secrets and should be withheld from public disclosure.
- 2. In support of its averment that the above-mentioned information is confidential, SWEC provides the following reasons:
 - a. The information sought to be withheld consists of calculation techniques applied to commercially available computer programs. These calculation techniques have been developed based upon SWEC's experience in the industry and represent technically efficient methods of applying the standard computer programs.
 - b. I am a Vice President for SWEC and have the authority to review and protect the confidential commercial information sought to be withheld.
 - c. SWEC is in the business of designing and constructing nuclear power plants. This business is competitive and firms that engage in it compete on the basis of the nature and quality of the products and services that they offer clients. The above-referenced material is one such product.
 - d. The subject material was developed at considerable expense to SWEC and is of substantial value to SWEC in the conduct of its business. A competitor would derive an unfair advantage in obtaining the proprietary information sought to be withheld, thus the unrestricted disclosure of this material could have an adverse commercial impact on SWEC. The data is plant specific; however, the methodology could be applied to other situations.
 - e. It is, accordingly, the customary practice of SWEC to treat such material as confidential commercial information.

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f. To the best of my knowledge and belief, the identified calculation techniques are not available from any public source and have not been made available to third parties, except in confidence.

William C. Drotleff, being duly sworn, deposes and says that he has read the foregoing affidavit and the matters stated therin are true and correct to the best of his knowledge, information, and belief.

William C. Drotleff

Vice President Stone & Webster Engineering Corporation

Sworn and subscribed before me this <u>Stat</u> day of November 1984

EILEEN M. CURRIE NOTARY PUBLIC OF NEW JERSEY My Commission Expires December 17, 1992

C3/12177/278/5Y

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Niagara Mohawk has re-evaluated the effects of runoff from the local probable maximum precipitation on safety related structures. The probable maximum precipitation values were developed using hydromet reports 51 and 52, as requested by the NRC. Enclosed is a Stone & Webster proprietary calculation which determines that the on site water surface elevations and durations of the probable maximum precipitation generated runoff. The topographic maps used to perform this analysis are also included. The study has determined that the effects of the onsite water surface elevations and durations caused by the probable maximum precipitation on safety related facilities and has classified the findings as follows:

- 1. No in leakage to buildings will occur.
- In leakage to buildings occurs; however, the accumulated quantity is such that no building up of water will result that might affect safe shutdown capability.
- 3. In leakage would occur resulting in accumulated buildup of water (assuming the building drains and sumps inoperable). Rather than evaluate safe shutdown capability, construction changes are in process to reclassify as no. 2 above. Where required, additional weatherproofing will be added.

In response to the NRC's request, the following additional information and justification for assuming unrestricted flow through the pipe arches under the access roads and railroad is provided. The assumption is justified by the following reasons:

- Any debris that might enter the ditch would be extremely small in relative size to the pipe arches, so no blockage would occur. Additionally, if soil debris, etc. were transported by slower velocity in the ditch, it would be flushed through the pipe arches because of their higher velocity.
- 2. The flat topography upstream of the pipe arches Most of the base upstream of the pipe arches is flat at about elevation 260 feet. The low flow velocity associated with flat terrain deprives the chance of flow to carry debris of significant size to the ditch.

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- 3. No source of significant debris The area drained by these pipe culverts is to be revegetated, therefore minimizing erosion. In addition, no major construction is planned for this drainage area after commercial operation; hence, there is no debris of significant size that could block the pipe culverts.
- 4. No historical debris buildup at the culverts The assumption of zero blockage is further supported by field inspection. During a recent site inspection, the engineer who is responsible for the probable maximum precipitation calculation inspected these pipe arches and found no evidence of trash or sediment buildup, even after ten years of construction in the area.



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