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 AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MILLER, C.L. Project Directorate I-2

SUBJECT: Forwards responses to questions asked during 920710 telcon re licensing topical rept on power uprate w/increased core flow submittal, dtd 920615. Responses withheld (REF 10CFR2.790).

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Pennsylvania Power & Light Company

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Harold W. Keiser
Senior Vice President-Nuclear
215/774-4194

JUL 24 1992

Director of Nuclear Reactor Regulation
Attention: Mr. C. L. Miller, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO 7/10/92 QUESTIONS ON
POWER UPRATE
PLA-3816** **FILES A17-8/P88-11/R41-2**

Docket Nos. 50-387
and 50-388

Reference: PLA-3788, H.W. Keiser to C.L. Miller, "Submittal of Licensing Topical Report on Power Uprate With Increased Core Flow," dated June 15, 1992.

Dear Mr. Miller:

The purpose of this letter is to transmit PP&L responses to the questions asked on the referenced report during a telecon with Mr. Ray Scholl of the NRC on July 10, 1992. Our responses, which are attached to this letter, provide certain requested General Electric Company (GE) setpoint calculations, as well as additional information regarding the flow-biased setpoints PP&L has chosen.

Due to the proprietary nature of the GE calculations, it is requested in accordance with 10CFR2.790 that the setpoint calculations be withheld from public disclosure. A GE affidavit to that effect is also enclosed.

Any questions on this material should be directed to Mr. R. Sgarro at (215) 774-7914.

Very truly yours,

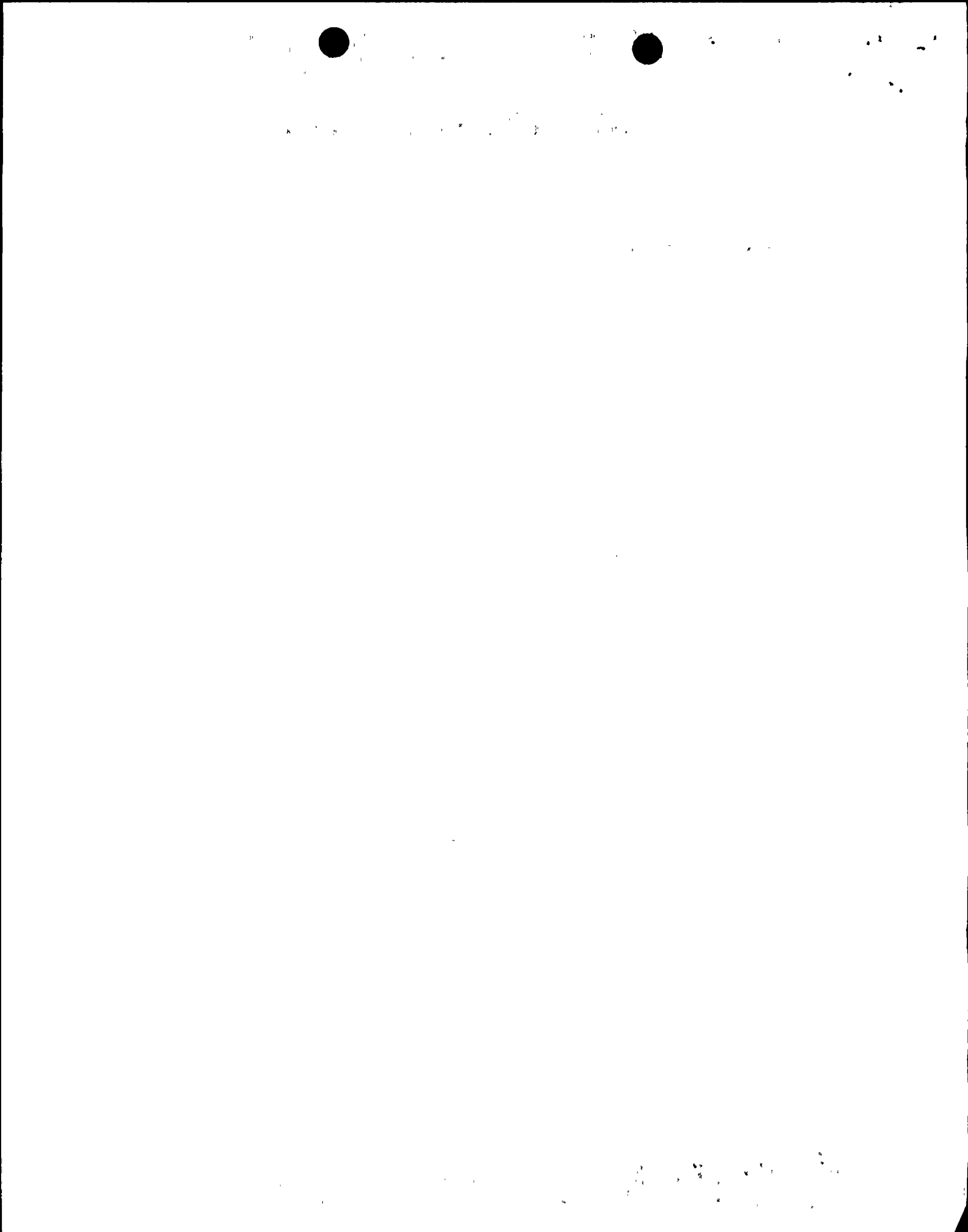


H. W. Keiser

Attachments

9207310113 920724
PDR ADDCK 05000387
PDR

APD 1/1



- 2 - FILES A17-8/P88-11/ PLA-3816
R41-2
Mr. C.L. Miller

cc: ~~NRC Document Control Desk~~ (original)
 NRC Region I
 Mr. G. S. Barber, NRC Sr. Resident Inspector
 Mr. G. F. Maxwell, Acting NRC Project Manager
 Mr. R. F. Scholl, NRR/ICSB, OWFN

General Electric Co. Proprietary Information

SUSQUEHANNA - 1 & 2

Power Uprate Instrument Setpoint Calculations

GENERAL ELECTRIC COMPANY

AFFIDAVIT

I, **ROBERT C. MITCHELL**, being duly sworn, depose and state as follows:

1. I am Manager, Safety, Environmental and Quality Assurance, General Electric Company, 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 in GE Report, GE-NE-901-026-0592, "Susquehanna-1 & 2 Setpoints for Power Uprate" dated July 10, 1992. The GE Proprietary portions of this report are identifiable by the "General Electric Co. Proprietary Information" designation at the top of the page.
3. In designating material as proprietary, General Electric utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it...A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information...Some factors to be considered in determining whether given information is one's trade secret are (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and to his competitors; (5) the amount of effort or money expended by him developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

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 where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies;
 - 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;

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- 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 General Electric, its customers or suppliers;
 - e. Information which reveals aspects of past, present or future General Electric customer-funded development plans and programs of potential commercial value to General Electric;
 - f. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
 - g. Information which General Electric must treat as proprietary according to agreements with other parties.
5. Initial approval of proprietary treatment of a document is typically made by the Subsection Manager of the originating component, the person who is most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the Company is limited on a "need to know" basis and such documents are clearly identified as proprietary.
 6. The procedure for approval of external release of such a document typically requires review by the Subsection Manager, Project Manager, Principal Scientist or other equivalent authority, by the Subsection Manager of the cognizant Marketing function (or delegate) and by the Legal Operation for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside General Electric are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees then only with appropriate protection by applicable regulatory provisions or proprietary agreements.
 7. 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 General Electric.
 8. The information to the best of my knowledge and belief has consistently been held in confidence by General Electric Company, no public disclosure has been made, and it is not available in public sources.



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9. All disclosures to third parties have been made pursuant to regulatory provisions of proprietary agreements which provide for maintenance of the information in confidence.
10. Public disclosure of the information sought to be withheld is likely to cause substantial harm to the competitive position of the General Electric Company and deprive or reduce the availability of profit making opportunities. A substantial effort has been expended by General Electric to develop this information.

STATE OF CALIFORNIA }
COUNTY OF SANTA CLARA }

SS:

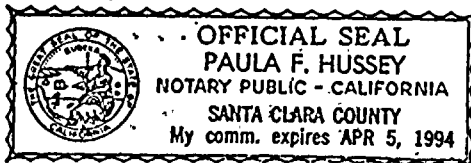
R. C. Mitchell, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are truly and correct to the best of his knowledge, information, and belief.

Executed at San Jose, California, this 21ST day of JULY 1992.

Robert C. Mitchell
Robert C. Mitchell
General Electric Company

Subscribed and sworn before me this 21ST day of July 1992.



Paula F. Hussey
Notary Public, State of California