

# CATEGORY 1

## REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9704040224      DOC. DATE: 97/03/27      NOTARIZED: YES      DOCKET #  
 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania      05000388  
 AUTH. NAME      AUTHOR AFFILIATION  
 BYRAM, R.G.      Pennsylvania Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                                  Document Control Branch (Document Control Desk)

SUBJECT: Forwards responses to NRC RAI on Siemen rept EMF-97-010, Rev 1.

DISTRIBUTION CODE: AP01D      COPIES RECEIVED: LTR 1 ENCL 1      SIZE: 5+16  
 TITLE: Proprietary Review Distribution - Pre Operating License & Operating R

### NOTES:

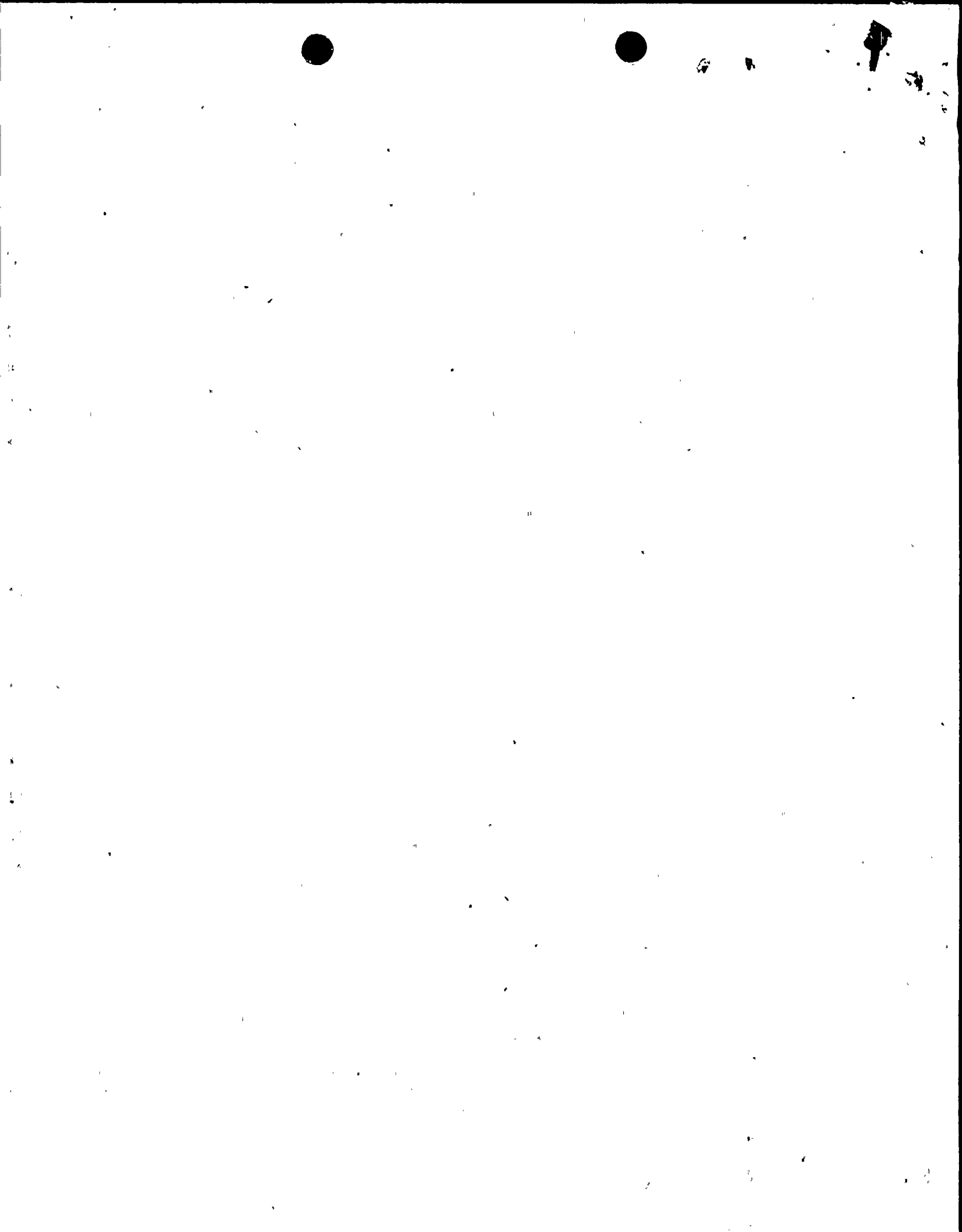
	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTR	ENCL		ID CODE/NAME		LTR	ENCL
	PD1-2 LA		1	1		PD1-2 PD		1	1
	POSLUSNY, C		1	1					
INTERNAL:	ACRS		1	1		<u>FILE CENTER 01</u>		1	1
	OGC/HDS2		1	0					
EXTERNAL:	NRC PDR		1						

*dw/out  
prop.*

NOTE TO ALL "RIDS" RECIPIENTS:  
 PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTR 7 ENCL 5

C  
A  
T  
E  
G  
O  
R  
Y  
1  
D  
O  
C  
U  
M  
E  
N  
T





**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Robert G. Byram  
Senior Vice President - Nuclear  
610/774-7502  
Fax: 610/774-5019

MAR 27 1997

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

**SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO NRC REQUEST FOR ADDITIONAL  
INFORMATION ON SIEMENS' REPORT EMF-97-010, REV. 1  
PLA-4595 FILE R41-2**

Docket No. 50-388

- References:
- 1) PLA-4527, "Proposed Amendment No. 166 to License NPF-22: Unit 2 Technical Specification Changes for ATRIUM<sup>TM</sup>-10 Fuel," December 18, 1996.
  - 2) PLA-4572, "Correction to Proposed Amendment No. 166 to License NPF-22: Unit 2 Technical Specification Changes to ATRIUM<sup>TM</sup>-10 Fuel," February 26, 1997.
  - 3) PLA-4582, "Addendum to Proposed Amendment No. 166 to License NPF-22: Revised ANFB Methodology and Core Flow Dependent MCPR Safety Limits," March 12, 1997.

This letter transmits PP&L's responses to the NRC's request for additional information which was presented to PP&L during a telecon on March 20, 1997. The questions posed by the NRC and PP&L's responses to those questions are included as Enclosure B to this letter. PP&L's responses were reviewed with the NRC during a presentation on March 26, 1997 and were discussed, in detail, with Messrs. John Carew (BNL) and Tai Huang (NRC) during the afternoon of the same day. PP&L believes that the attached reflects the discussions of March 26th.

The information presented in the attached responses provides clarification of the methodology previously provided to the NRC in EMF-97-010, Rev. 1, as part of Reference 1 and does not change any of the methodology or present any new methodology relating to PP&L's proposed amendment described in References 1, 2 and 3.

The information contained in the responses is of the type that Siemens Power Corporation maintains in confidence and withholds from public disclosure. It has been handled and classified (as proprietary) as indicated in the attached affidavit (Enclosure A). PP&L requests that these responses be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790.

9704040224 970327  
PDR ADDCK 05000388  
PDR



change distribution: NRC PDL 1 1 w/o prep

APD/11

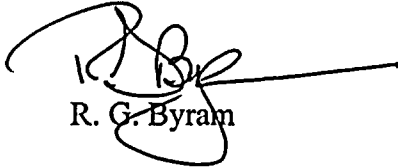


Small, faint, illegible markings or characters in the top right corner.

Small, faint, illegible markings or characters in the bottom right corner.

Any questions regarding this response should be directed to Mr. A. K. Maron at (610) 774-7727.

Very truly yours,



R. G. Byram

Attachments

copy: NRC Region I  
Mr. K. Jenison, NRC Sr. Resident Inspector  
Mr. C. Poslusny, Jr., NRC Sr. Project Manager  
Mr. W. P. Dornsife, Pa. DEP  
Mr. John Carew, Brookhaven National Lab.  
Mr. Tai Huang, NRC-OWFN





5. The Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document will not be disclosed or divulged.

6. The Document contains information which is vital to a competitive advantage of SPC and would be helpful to competitors of SPC when competing with SPC.

7. The information contained in the Document is considered to be proprietary by SPC because it reveals certain distinguishing aspects of SPC licensing methodology which secure competitive advantage to SPC for fuel design optimization and marketability, and includes information utilized by SPC in its business which affords SPC an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

8. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it valuable insights into SPC licensing methodology and would result in substantial harm to the competitive position of SPC.

9. The Document contains proprietary information which is held in confidence by SPC and is not available in public sources.

10. In accordance with SPC's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside SPC only as required and under suitable agreement providing for nondisclosure and limited use of the information.

11. SPC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.





12. Information in this Document provides insight into SPC licensing methodology developed by SPC. SPC has invested significant resources in developing the methodology as well as the strategy for this application. Assuming a competitor had available the same background data and incentives as SPC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as SPC.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

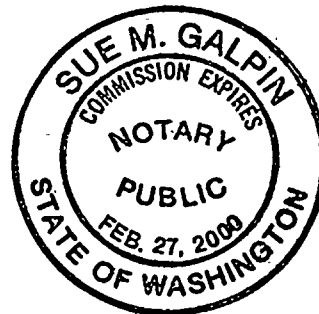
FURTHER AFFIANT SAYETH NOT.

*S. Galpin*

SUBSCRIBED before me this 26<sup>th</sup>  
day of March, 1997.

*Sue M. Galpin*

Sue M. Galpin  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 2/27/00



6

