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SUBJECT: Forwards proprietary response to RAI on proposed amend 166 to license NPF-22 re Unit 2 TS changes for ATRIUM-10 fuel.

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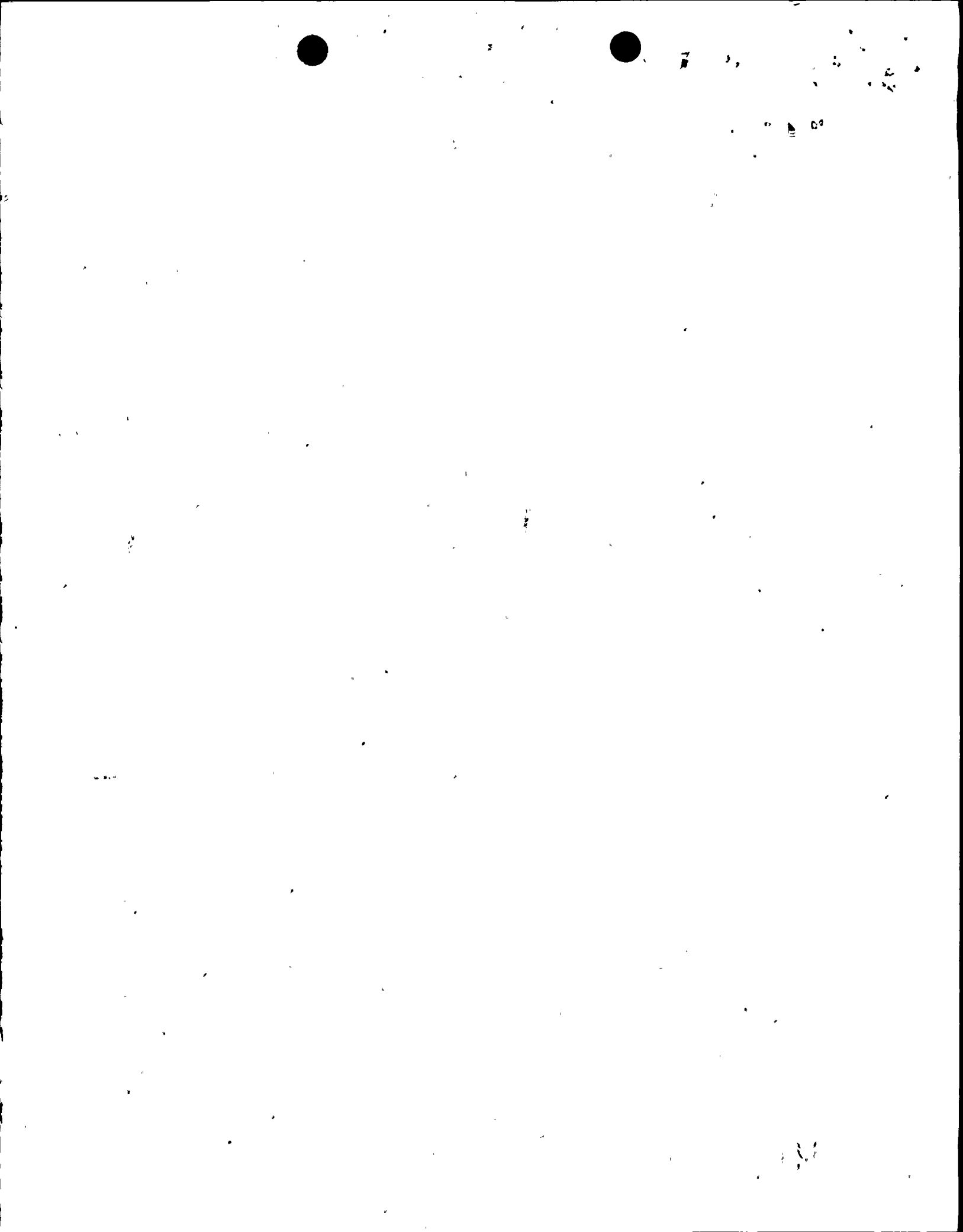
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APR 09 1997

U. S. Nuclear Regulatory Commission  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO NRC REQUEST FOR ADDITIONAL  
INFORMATION ON PP&L'S PROPOSED AMENDMENT NO. 166  
TO LICENSE NO. NPF-22: UNIT 2 TECHNICAL SPECIFICATION  
CHANGES FOR ATRIUM™-10 FUEL  
PLA-4605**

**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™-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™-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.
  - 4) PLA-4595, "Response to NRC Request for Additional Information on Siemens' Report EMF-97-010, Rev. 1," March 27, 1997.

The purpose of this letter to transmit Pennsylvania Power and Light's (PP&L's) response to the NRC Request for Additional Information on Proposed Amendment No. 166 to License No. NPF-22: Unit 2 Technical Specification Changes for ATRIUM™-10 Fuel (References 1, 2, &3). Enclosure A to this letter restates the NRC questions followed by PP&L's responses to each question.

The responses presented in the attached enclosure provide additional clarification of the information previously provided to the NRC in Reference 3. This additional clarification 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.

AP01/11

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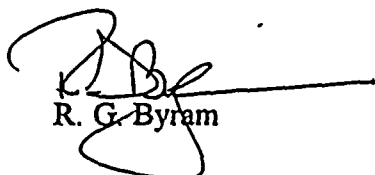
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It should be noted that the information contained in the responses is of the type that Siemens Power Corporation maintains in confidence and withholds from public disclosure. It has been handled and classified as proprietary as indicated in the attached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

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

AFFIDAVIT

STATE OF WASHINGTON )  
  ) ss  
COUNTY OF BENTON    )

I, H. D. Curet, being duly sworn, hereby say and depose:

1. I am Manager, Product Licensing, for Siemens Power Corporation ("SPC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with SPC's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the Siemens Power Corporation information in the Attachment Request for Additional Information transmitted to the NRC by PP&L letter PLA-4605, File R41-2, "Susquehanna Steam Electric Station Response to NRC Request for Additional Information on PP&L's Proposed License Amendment No. 166 to License No. NPF-22: Unit 2 Technical Specification Changes for ATRIUM™-10 Fuel," dated April 9, 1997, referred to as "Document." Information contained in this Document has been classified by SPC as proprietary in accordance with the control system and policies established by SPC for the control and protection of information.

4. The Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by SPC and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as proprietary and confidential.

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.

*Ad Court*

SUBSCRIBED before me this 9<sup>th</sup>  
day of April, 1997.

*Sue M. Galpin*

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

