

# CATEGORY 1

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 BYRAM, R.G.                      Pennsylvania Power & Light Co.  
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SUBJECT: Forwards proprietary response to RAI re proposed license amend 209 to TS supporting cyle 11 reload. Proprietary info withheld, per 10CFR2.790.

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Robert G. Byram  
Senior Vice President  
Generation and Chief Nuclear Officer  
Tel. 610.774.7502 Fax 610.774.5019  
E-mail: rgbyram@papl.com

PP&L, Inc.  
Two North Ninth Street  
Allentown, PA 18101-1179  
Tel. 610.774.5151  
http://www.papl.com/



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**SUSQUEHANNA STEAM ELECTRIC STATION  
REVISION TO BASES FOR PROPOSED AMENDMENT  
NO. 209 TO LICENSE NPF-14 AND RESPONSE TO  
NRC REQUEST FOR ADDITIONAL INFORMATION  
PLA-4841 FILE R41-2**

Docket Nos. 50-387  
and 50-388

- References: 1) PLA-4664, "Proposed Amendment No. 209 To License NPF-14: Unit 1 Technical Specification Changes For ATRIUM™10," August 26, 1997.  
2) PLA-4802, "Unit 1 Cycle 11 Information," December 4, 1997.

This letter provides responses to questions raised during the NRC review of the proposed U1C11 reload license amendment request (Reference 1) and provides a minor clarification change to the proposed Technical Specification bases included in Reference 1.

PP&L submitted a proposed change to the Susquehanna Unit 1 Technical Specifications to support Cycle 11 operation in Reference 1. On October 15, 1997, PP&L met with members of the NRC staff to discuss the proposed change. On December 4, 1997, PP&L submitted additional information related to the Susquehanna Unit 1 Cycle 11 core and associated MCPR Safety Limit analyses as requested at the October 15th meeting. As a result of further review of the submittal, the NRC staff has requested additional information related to PP&L's proposed changes. The additional information is provided in Attachment I.

Note that information provided in Attachment I, Response 3 (including Figure 1) 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 (Attachment III). PP&L requests that this response be withheld from public disclosure in accordance with the provisions of 10CFR 2.790.

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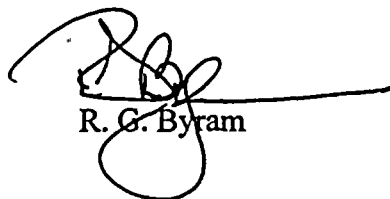
A-PO-7-11



In preparing these responses, PP&L determined that a clarification to the proposed Technical Specification Bases Section 2.1.1 is necessary. Attachment II provides the revised Technical Specification Bases. This change is considered to be a clarification of the original Technical Specification Bases. Therefore, the Safety Assessment, No Significant Hazards Determination, and Environmental Analysis previously provided in Reference 1 remain applicable.

For further information please contact Mr. A. J. Roscioli at (610) 774-4019.

Sincerely,



R. G. Byram

Attachments

copy: Regional Administrator - Region I  
Mr. K. Jenison, NRC Sr. Resident Inspector  
Mr. V. Nerses, NRC Project Manager  
Mr. K. Kerns, Pa. DEP





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.

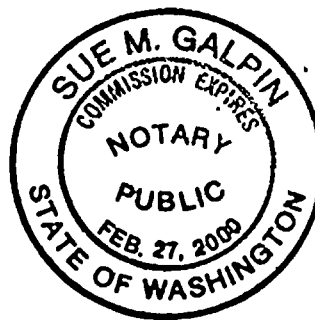
FURTHER AFFIANT SAYETH NOT.

*[Handwritten Signature]*

SUBSCRIBED before me this 30<sup>th</sup>  
day of January, 1998.

*Sue M. Galpin*

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





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ATTACHMENT II TO PLA-4841

INSERT 2

For the SPC ATRIUM-10 design, the minimum bundle flow is greater than 28,000 lbs/hr. For both the SPC 9x9-2 and ATRIUM-10 fuel designs, the coolant minimum flow and maximum flow area is such that the mass flux is always greater than  $0.25 \times 10^6$  lbs/hr-ft<sup>2</sup>. Full scale ~~ATLAS~~ test data taken at pressures from 14.7 psia to ~~900~~ psia indicate that the fuel assembly critical power at  $0.25 \times 10^6$  lbs/hr-ft<sup>2</sup> is 3.35 Mwt or greater.

critical power

1400

from various SPC and GE  
fuel designs

**ATTACHMENT III TO PLA-4841**



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