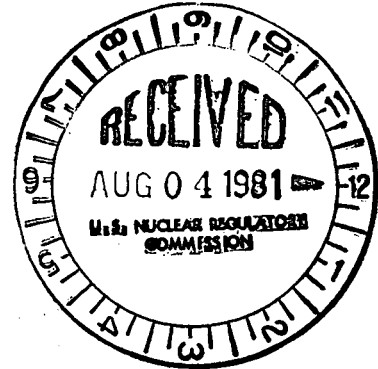


BALTIMORE GAS AND ELECTRIC COMPANY

P.O. BOX 1475
BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY



July 31, 1981

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Mr D. G. Eisenhut, Director, Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant Units Nos. 1 & 2, Docket Nos. 50-317 and 50-318
Palisades Nuclear Power Plant, Docket No. 50-255
Fort Calhoun Nuclear Power Plant, Docket No. 50-285
Millstone Nuclear Power Plant Unit No. 2, Docket No. 50-336
Asymmetric LOCA Loads Response to NRC Questions

- References:
- a) NRC letter dated 01-25-78 from V. Stello, Jr. to All PWR Licensees, Asymmetric Loads.
 - b) BG&E letter dated 06-20-80 from A. E. Lundvall, Jr. to D. G. Eisenhut, same subject.
 - c) BG&E letter dated 07-31-80 from A. E. Lundvall, Jr. to D. G. Eisenhut, same subject.
 - d) NRC letter dated 02-23-81 from D. M. Crutchfield to A.E. Lundvall, Jr. same subject.
 - e) BG&E letter dated 05-26-81 from A. E. Lundvall, Jr. to D. G. Eisenhut, same subject.

Gentlemen:

In an effort to respond to the requirements of Reference (a), Baltimore Gas and Electric, Northeast Utilities, Consumers Power, and the Omaha Public Power District submitted in References (b) and (c) the Combustion Engineering Owners' Group (CEOG) Final Report. Reference (d) required the CEOG to provide additional information concerning this report within ninety (90) days of receipt of Reference (d). Reference (e) requested a delay in our submittal until August 1, 1981. The CEOG hereby submits ten (10) copies of Enclosure (1), the CEOG response to NRC questions listed in Reference (d). Three of these copies are being forwarded to your Mr. Jim Shea for review.

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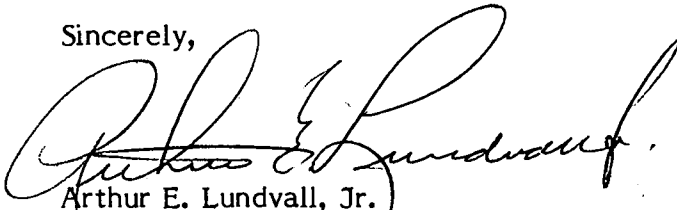
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Appendix A of this report, ten (10) copies of which are enclosed, is considered proprietary. Enclosure (2) is an affidavit from Combustion Engineering, Inc. requesting that the information contained in Appendix A of Enclosure (1) be withheld from public disclosure in accordance with 10 CFR 2.790. A non-proprietary version of Appendix A is included in this report.

We believe that the contents of Enclosure (1) address all NRC concerns related to the information submitted in References (b) and (c). Based on the results of this and previous submittals, we believe that continued operation of Calvert Cliffs Units 1 and 2, Fort Calhoun, Palisades, and Millstone Unit 2 is justified.

Sincerely,



Arthur E. Lundvall, Jr.
Vice President
Supply

Enclosures

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Messrs. E. L. Conner, Jr., NRC
P. W. Kruse, CE
G. F. Pratt, Consumers Powr Co.
A. Puri, Northeast Utilities Co.
S. U. Kahn, Omaha Public Power District

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, A. E. Scherer depose and say that I am the Director, Nuclear Licensing of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the applications of Baltimore Gas & Electric Company, Omaha Public Power District, Northeast Utilities and Consumers Power Company, for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

Attachment 2 to C-E letter number BG & E-10276-149, C-E PROPRIETARY RESPONSES TO QUESTIONS ON THE REACTOR COOLANT SYSTEM ASYMMETRIC LOADS EVALUATION PROGRAM FINAL REPORT prepared by Combustion Engineering for Calvert Cliffs 1 & 2, Fort Calhoun, Millstone 2 and Palisades, June, 1981.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration

by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure are fuel test results, applied axial LOCA internals loads, core plate motions and spacer grid impact time histories, as well as blowdown load models and certain impact data for the use of these models, which is owned and has been held in confidence by Combustion Engineering.

2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a substantial competitive advantage to Combustion Engineering.

3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F.M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject documents herein are proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:

a. A similar product is manufactured and sold by major pressurized water reactors competitors of Combustion Engineering.

b. Development of this information by C-E required thousands of manhours of effort and hundreds of thousands of dollars. To the best of my knowledge and belief a competitor would have to undergo similar expense in generating equivalent information.

c. In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development of fuel tests, gathering and analyzing applied axial LOCA internals loads, core plate motions and spacer grid impact time histories, as well as the development of blowdown load models and the impact data for the use of these models.

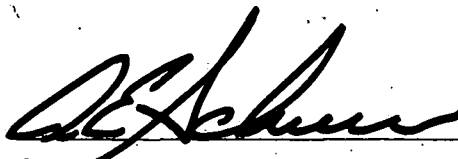
d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

e. The information consists of fuel test results, applied axial LOCA internals loads, core plate motions and spacer grid impact time histories, as well as blowdown models and certain impact data for the use of these models, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

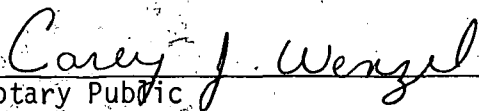
Further the deponent sayeth not.



A. E. Scherer
Director
Nuclear Licensing

Sworn to before me

this 24th day of July, 1981


Notary Public

CAREY J. WENZEL, NOTARY PUBLIC
State of Connecticut No. 59962
Commission Expires March 31, 1985