

P. O. Box 529100  
Miami, Florida 33152

November 19, 1979

Dr. Denwood F. Ross, Jr., Director  
Bulletins & Orders Task Force  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: LOFT L3-1 Test

Dear Dr. Ross:

At your request, we are providing Combustion Engineering's (C-E) partial pre-test analysis of LOFT Test L3-1. As per the agreement reached with members of your Staff at a meeting on November 19, 1979, enclosed are a list of input, a nodalization diagram for the LOFT test facility, output graphs and a list documenting the ECCS code modifications incorporated. The enclosures were generated using a best estimate approach with a modified version of the C-E Small Break Evaluation Model. The analysis performed to date includes calculation of the blowdown phase of the LOFT L3-1 test up until Safety Injection Tank actuation (~800 secs. into the transient).

Due to the proprietary nature of some of the material contained in the enclosures, we request that it be withheld in accordance with the provisions of 10 CFR 2.790 and that this material be safeguarded. The reasons for the classification of this material as proprietary are delineated in the enclosed affidavit.

It is our intention to provide a complete analysis of the LOFT L3-1 small break test. The final analysis will include results of the blowdown calculation after Safety Injection Tank actuation and the accompanying peak cladding temperature profile from the onset of the transient through reflood and refill.

Should questions arise concerning the enclosed material, please feel free to contact myself at (305) 552-3811 or Mr. Ken Morris of Omaha Public Power District at (402) 536-4505.

Very truly yours,

*George Liebler for*

George Liebler, Chairman  
C-E Owners Group

Enc.

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TO OTHERS RECEIVE  
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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 Manager, 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 those utilities operating nuclear power plants with Combustion Engineering designed nuclear steam supply systems (Arkansas Power & Light Co., Baltimore Gas & Electric Co., Consumers Power Co., Florida Power & Light Co., Northeast Utilities, Omaha Public Power District and Yankee Atomic Electric Company) for withholding this information.

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

Combustion Engineering Best Estimate Partial Pre-Test Analysis of LOFT Test L3-1.

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

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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 is a nodalization diagram of the LOFT test facility 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.

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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 man-hours 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 ECCS computer code development.

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.

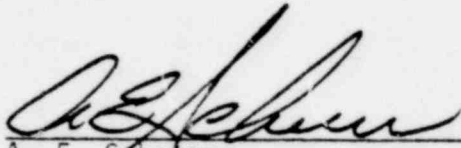
e. The information consists of details of our ECCS code depicting the nodalization of the flow path between the reactor vessel upper plenum and the steam generator, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them 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.

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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.

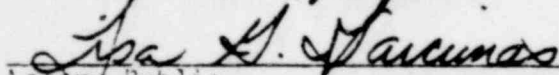
Further the deponent sayeth not.

  
A. E. Schefer

Manager, Licensing

Sworn to before me

this 19<sup>th</sup> day of November

  
Notary Public

LISA G. WAICUNAS, NOTARY PUBLIC  
State of Connecticut No. 54492  
Commission Expires March 31, 1983

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