



General Electric Company
175 Carnegie Avenue, San Jose, CA 95125

April 9, 1993

MFN No. 051-93
Docket No. STN 52-001

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Richard Borchardt, Acting Director
Standardization Project Directorate

Subject: ABWR Information Withheld from Public Disclosure

By letter Docket No. 52-001 dated March 9, 1993, your organization requested that GE provide additional information on the basis for withholding the following information from public disclosure:

Interlock Block Diagrams (IBD's) and Instrumentation Electrical Diagrams (IED's) of ABWR SSAR Chapter 7;

Radwaste Building Arrangements and P&IDs of ABWR SSAR Chapters 1, 11, and 12, and the corresponding text in Chapter 11;

The normal and accident environmental conditions for equipment qualification design in ABWR SSAR Chapter 3, Appendix I;

The SAFER/GESTR LOCA analysis results in ABWR SSAR Chapter 6.

Your organization also noted there was an apparent discrepancy in the proprietary classification of reference documents for Section 12.4.6 of the SSAR as they are referred to in the SSAR and as they were transmitted to the NRC.

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GE has been evaluating these items and has concluded that:

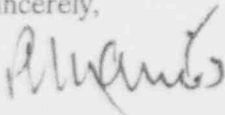
- 1) The Environmental Qualification information in SSAR Chapter 3, Appendix I, can be reclassified as non-proprietary. The affected pages will be revised in a future amendment with the proprietary designation removed.
- 2) LOCA analysis results were included in SARs as non-proprietary information prior to development of General Electric's SAFER/GESTR analysis method. However, GE has consistently treated both the more advanced SAFER/GESTR methodology and analysis results as proprietary. These results, if disclosed, would provide data and insight on methods that would enable competitors to realize significant commercial benefits in reactor and fuel design and licensing, and thus affect our position in the market. For example, knowledge of the results and methods could provide competitors price advantages from not having to complete portions of the detailed analyses and calculations developed by GE at significant cost, utilizing specialized skills. As such, all the information in Section 6.3 of the ABWR SSAR presently identified as proprietary will retain that classification.
- 3) Regarding the IBDs and IEDs, GE has an information use agreement with Tokyo Electric Power Company (TEPCO), Hitachi, and Toshiba which restricts disclosure of certain ABWR information. The information contained in the IBDs and IEDs presently falls into that category, as they are extracted from proprietary documents developed by the partnership arrangement. GE is re-evaluating that information and pursuing the possibility of declassifying at least some of the IED and IBD data. Because of the complexity of the arrangement with multiple partners and the need to confirm the commercial necessity of maintaining the information proprietary, additional time (60 days beyond the 30 day response time requested by Docket Letter 52-001) will be needed for GE to complete our responses in this area.
- 4) Regarding the Radwaste Building arrangement (SSAR Section 1.2) and Liquid and Solid Radwaste design (SSAR Sections 11.2 and 11.4), GE has specific Radwaste agreements (separate from the agreement mentioned in Item 3) with Toshiba and Hitachi which restrict disclosure of information in these areas. Recently, GE has been asked to confirm that we have not disseminated Radwaste data in an unrestricted manner as part of recent work. GE will pursue the possibility of declassifying some of this data. However, as in Item 3, we will need additional time (60 days beyond the 30 day response time requested by Docket Letter 52-001) to complete this effort.
- 5) Regarding the Gaseous Radwaste design (SSAR Section 11.3), GE developed this design for the ABWR. We will re-evaluate the information in the SSAR in this area and determine whether a portion of this data can be declassified. Additional time will be needed to complete this review, which can be accomplished in parallel with Items 3 and 4.

When the evaluation of the items being questioned above is completed, we will submit a replacement ABWR SSAR proprietary package, including affidavit, for the one transmitted by letter MFN No. 158-92, to provide the most current information.

As for the discrepancy in the classification of the reference documents for ABWR SSAR Section 12.4.6, GE will submit a revision to its March 9, 1992 affidavit (MFN No. 055-92) withholding only NEDE-24679 and identifying it as proprietary in ABWR SSAR Section 12.4.6. In addition, NEDE-23819, NEDE-23996-1 and NEDE-23996-2 will be reissued as GE Class I reports permitting general distribution.

In summary, GE is in the process of re-evaluating those sections identified as proprietary in the ABWR SSAR that you questioned. We have completed our review of some of the subjects but, as stated above, an additional 60 days beyond the requested 30 day response time, will be needed to complete our review of all the items. We thank you for your courtesy in this matter.

Sincerely,



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