



ARKANSAS POWER & LIGHT COMPANY  
 POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

October 12, 1978

2-108-4

Director of Nuclear Reactor Regulatory  
 ATTN: Mr. J. F. Stolz, Chief  
 Light Water Reactors Branch #1  
 U. S. Nuclear Regulatory Commission  
 Washington, D. C. 20555

Subject: Arkansas Nuclear One- Unit 2  
 Docket No. 50-368  
 License No. NPF-6  
 CPC Documentation  
 (File: 2-1510)

Gentlemen: **NON-PROPRIETARY VERSIONS CONTROLLED & DISTRIBUTED SEPARATELY**

Arkansas Power and Light Company made commitments to the Nuclear Regulatory Commission to resolve CPC Position 19 in our letters dated May 11, 1978. These commitments were discussed with the NRC staff in late March and early April and are summarized as follows:

1. The NRC requirement for addition of multi-variable transient capability would be added to the Single Channel Test Facility through the incorporation of the Dynamic Software Verification Test (DSVT) into the software test program.
2. The NRC requirement for single channel exercise of the high power selection would be met by re-test of the single channel with this feature being exercised.
3. The NRC requirement for qualification of the CPC/CEAC/Operator's Module interfaces would be met by the addition of a CEAC to the Single Channel Test Facility.
4. The NRC requirement for comparison of single channel test facility and 4-channel response would be met through use of DSVT tests on both systems, with the results being compared.
5. Updates of documentation resulting from 1 through 3 above would result in submittal of a modified CPC Single Channel Qualification Test Report (CEN-71 (A)-P) and a modified CPC Software Change Procedure (CEN-39(A)-P).

Supplement No. 2 to Safety Evaluation Report for ANO-2 was issued in August

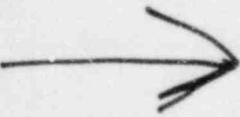
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*None  
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1978. This report required that additional information be submitted that describes the process noise testing to be performed in the qualification of software changes.

At a meeting among AP&L, C-E and the NRC Staff on August 31, 1978, discussions were held to present the intended text of CEN-39(A)-P with regard to Phase II test case selection, Phase II test acceptance criteria, and inclusion of process noise tests during qualification of software changes. Follow-up telephone calls with the NRC Staff resolved some wording problems that were not resolved during the meeting.

Pursuant to the above commitments enclosed are:



CEN-39(A)-P Rev. 1 (proprietary copies 13 through 20).  
CEN-39(A)-P Supplement 1P (proprietary copies 13 through 20).  
CEN-71(A)-P Supplement 1P (proprietary copies 13 through 20).

Proprietary copy nos. 1 through 5 of the above documents were previously provided to Mr. L. Beltracchi on September 22, and September 29, 1978.

During the process of modifying CEN-39(A)-P, portions of the text and a number of appendices were combined and expanded into a supplement to CEN-39(A)-P. This was done to isolate (1) less detailed portions of the procedure stating what must be done during software modifications (now in the body of CEN-39(A)-P) from (2) highly detailed step-by-step procedures for performing implementation of software changes (now in supplement to CEN-39(A)-P). This supplement contains details of procedures for the updating and assembly of CPC/CEAC source files and the integration of the CPC/CEAC system software and procedures for generation of CPC/CEAC reference and test disks.

Certain information contained in the enclosures is proprietary to Combustion Engineering, Inc. Pursuant to 10CFR2.790, it is requested that this information be withheld from public disclosure. Also, in accordance with 10CFR-2.790(b) it is recognized that withholding this information from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the information. ~~The non-proprietary versions of all enclosed proprietary documents are enclosed.~~ Non-proprietary information on the CPC system software is also contained in Appendix 7A of the ANO-2 FSAR. In addition the affidavits specified by 10CFR2.790(b) are enclosed. This information has been characterized as proprietary for one or more of the following reasons:

1. The use of the information by a competitor would substantially decrease his expenditures, in time and resources, in designing, producing or marketing a similar product.
2. This 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, Inc.

3. The information reveals special aspects of a process, method, component or the like, the exclusive use of which results in a substantial competitive advantage to Combustion Engineering, Inc.

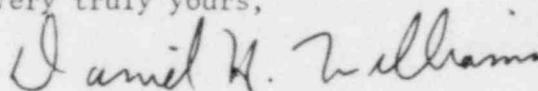
The information considered to be proprietary has been denoted by vertical brackets in the margins.

If you should have any questions concerning the proprietary nature of the material transmitted herewith, please address these questions to:

Mr. A. E. Scherer  
Licensing Manager (9438-401)  
Combustion Engineering, Inc.  
1000 Prospect Hill Road  
Windsor, Connecticut 06095

We also request that you provide a copy of any questions concerning the proprietary nature of this submittal to the Arkansas Power and Light Company.

Very truly yours,



Daniel H. Williams  
Manager, Licensing

DH:W:CSP:jaj

Enclosures

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

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

I, F. M. Stern, depose and say that I am the Vice-President, Engineering and Development, 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 application of Arkansas Power and Light Company, for withholding this information.

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

CPC Protection Algorithm Software Change Procedure, CEN-39(A)-P  
Revision 1 and Supplement 1-P thereto.

These documents have 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 documents, should be withheld.

1. The information sought to be withheld from public disclosure is the methods, procedures and equipment for implementing CPC software changes, 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 hundreds of man-hours of effort and 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 developing equivalent methods, procedures and equipment for implementing CPC software changes.

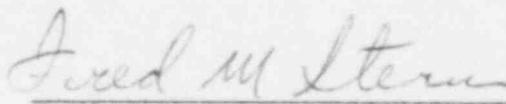
d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

e. The information consists of methods, procedures and equipment for implementing CPC software changes, 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.

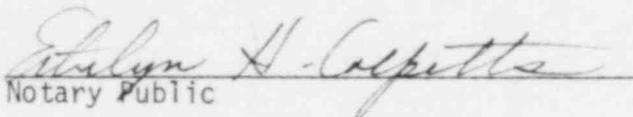
Further the deponent sayeth not.



F. M. Stern  
Vice-President, Engineering & Development

Sworn to before me

this 9<sup>th</sup> day of Oct. 1978

  
Notary Public

ETHELYN H. COLPITTS, NOTARY PUBLIC  
State of Connecticut No. 33976  
Commission Expires March 31, 1983

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

Core Protection Calculator Single Channel Test Report Supplement,  
CEN-71(A)-P Supplement 1-P.

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 is the CPC single channel test results and the methods of generating acceptance criteria, 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.

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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 hundreds of man-hours of effort and 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 developing an equivalent acceptance criteria methodology and performing single channel tests to obtain the data to support the methodology.

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.

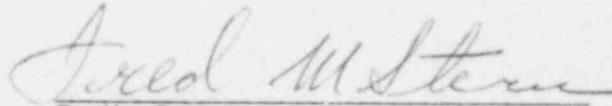
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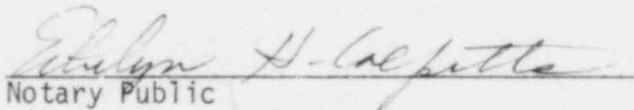


F. M. Stern

Vice-President, Engineering and Development

Sworn to before me

this *9th* day of *Oct*, 1978

  
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