



LOUISIANA
POWER & LIGHT

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January 26, 1982

L. V. MAURIN
Vice President
Nuclear Operations

W3P82-0194
3-A1.01.04

Mr. R. L. Tedesco
Assistant Director of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



SUBJECT: Louisiana Power & Light Company
Waterford Steam Electric Station - Unit No. 3
Method of Coolability Analysis for
Deformed Grids in Peripheral Assemblies

ENCLOSURE: (1) Report, "Method of Coolability Analysis
for Deformed Grids in Peripheral Assemblies"

Dear Mr. Tedesco:

A description of the method of analysis to demonstrate coolability of deformed peripheral fuel assemblies was requested by your Mr. N. Lauben. By copy of this letter, copies 0001 through 0004 of the Proprietary Report with Affidavit, prepared to respond to this request, are being sent along with a non-proprietary version.

The coolability analysis will demonstrate that the allowable peak linear heat generation rate (PLHGR) in the deformed peripheral assemblies is greater than the actual maximum PLHGR that can occur in those assemblies.

Please be cautioned that the information contained in Enclosure (1) contains proprietary information. Pursuant to Section 2.790, 10 CFR Part 2, you are requested to withhold this information from public disclosure. Also, in accordance with 10 CFR Section 2.790 (b) we recognize that withholding this information from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the information.

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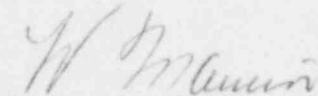
Mr. R. L. Tedesco
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If you have any questions concerning the proprietary nature of the material transmitted herewith, please address these questions directly to:

Mr. A. E. Scherer
Director of Licensing (9438-1922)
Combustion Engineering, Inc.
1000 Prospect Hill Rd.
Windsor, CT 06095

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

Yours very truly,


L. V. Maurin

LVM/REW/kbm

Enclosure

cc: W. M. Stevenson, E. L. Blake, S. Black

bcc: Ebasco (2), J. M. Brooks, R. J. Milhiser (2), D. B. Lester
F. J. Drummond, T. F. Gerrets, C. J. Decareaux, T. K. Armington,
P. V. Prasankumar, J. R. McGaha, D. C. Gibbs, Richard Hymes,
L. L. Bass, M. I. Meyer, Central Records, L. V. Maurin,
Nuclear Records (2), L. Constable, R. W. Prados, R. M. Foley,
K. R. Iyengar

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

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

I, P. L. McGill depose and say that I am the Vice President, Commercial 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 Louisiana Power and Light Company for withholding this information.

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

Proprietary Enclosure to C-CE-7452.

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 the method of coolability analysis for deformed fuel grids in peripheral fuel assemblies 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 a method for analyzing the coolability of deformed fuel grids in peripheral fuel assemblies of a reactor core.

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.

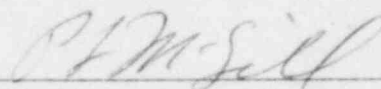
e. The information consists of a method for coolability analysis of deformed fuel grids in peripheral fuel assemblies, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with 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.

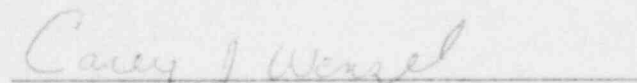
Further the deponent sayeth not.



P. L. McGill
Vice President
Commercial

Sworn to before me

this 6th day of January, 1982


Notary Public

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