

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of : Docket Nos. 50-352  
PHILADELPHIA ELECTRIC COMPANY : 50-353

AMENDMENT NO. 35  
TO  
LICENSE APPLICATION OF  
PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATION STATION  
UNITS NO. 1 & 2

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Philadelphia Electric Company

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Philadelphia Electric Company hereby amends its Application in the above entitled proceedings (a) by making the deletions, substitutions and additions to the Final Safety Analysis Report shown on the document entitled "Limerick Generating Station, Units 1 & 2 Final Safety Analysis Report, Revision 7 Page Changes", dated June, 1982, which is filed herewith and made a part hereof; (b) by making the deletions, substitutions and additions to the Emergency Plan shown on the document entitled "Limerick Generating Station Units 1 & 2, Revision 2 Emergency Plan Page Changes" dated June, 1982, which is filed herewith and made a part hereof; and (c) by adding thereto Volume 3 of a document entitled "DESIGN ASSESSMENT

REPORT, LIMERICK GENERATING STATION UNITS 1 & 2", which is filed herewith and made a part hereof.

Volume 3 of the Design Assessment Report contains detailed information on the analysis of suppression pool and hydrodynamic loads which is considered by Pennsylvania Power & Light Company to be confidential and proprietary information containing trade secrets. Accordingly, it is hereby requested that Volume 3 of the Design Assessment Report be withheld from public disclosure in accordance with Section 2.790 of the Commission's regulations. An affidavit of Norman W. Curtis, Vice President of Pennsylvania Power & Light Company, in support of this request is attached hereto as Exhibit A.

Respectfully submitted,

PHILADELPHIA ELECTRIC COMPANY


By: *V. S. Boyer*  
Senior Vice President





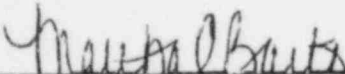
- to engineer the quencher device. PP&L submitted to the NRC its Susquehanna DAR (See Docket Nos. 50-387 and 50-388) which explained the response of the containment system to safety relief valve (SRV) discharge and loss of coolant accident (LOCA) loads, and contained certain information considered by PP&L as proprietary. These proprietary portions of the Susquehanna DAR concerned the full scale test portion of the PP&L and KWU efforts and the design technique for assessing the containment system margins. The document is of considerable importance because it enables one to define loads associated with SRV discharge. The document, therefore, is a valuable tool in applying the KWU information.
- c. Although the Susquehanna DAR and the KWU information was prepared specifically for application to Susquehanna, it is of value to anyone desiring to apply it to any plant employing a similar pressure suppression system. Because of the value of this information and its market potential, PP&L considers it to be the type that is customarily held in confidence. As a result, PP&L requested and the NRC agreed to withhold this information from public disclosure pursuant to 10 CFR §2.790.
  - d. Volume 3 of the Limerick DAR is based on the Susquehanna DAR and the KWU information. It was developed as a result of significant effort and expense by PP&L. PP&L has spent considerable time and money in obtaining a contract with KWU, and developing the test plan and test matrix. PP&L thus far has paid KWU approximately \$4.5 million in connection with the KWU contract.
  - e. Pursuant to an agreement dated August 10, 1978, PP&L sold to PECO the right to use the KWU information described herein for PECO's Limerick Generating Station Units 1 and 2. Pursuant to the agreement, PECO is required to maintain the proprietary and confidential nature of the information contained in Volume 3 of the Limerick DAR.

- f. The information contained in Volume 3 of the Limerick DAR has been and will continue to be held in strict confidence. External distribution of this information is restricted. Each of the recipients of this information has promised to honor the proprietary value of the information and is precluded from using this information for any purpose other than certain specific enumerated applications. These recipients limit the access of the information to those persons in their employ who have a need to use the information in the performance of their duties.
- g. None of the information provided therein will be found in any public sources.
- h. Because of the expense it has incurred in the development of this information, the marketability of this information, which will enable it to recoup a portion of these additional expenses, and the economic harm that PP&L would suffer from its inability to sell the information, the need for protecting PP&L's interest outweighs the interest involved in public disclosure.



Norman W. Curtis  
Vice President,  
Engineering & Construction - Nuclear  
Pennsylvania Power & Light Company

Sworn and subscribed  
before me this 15<sup>th</sup>  
day of June, 1982



MARTHA C. BARTO, Notary Public  
Allentown, Lehigh County, Pa.  
My Commission Expires Jan. 13, 1986