



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 1, 1994

Docket Nos. 50-352
and 50-353

Mr. David J. Robare
Project Manager-Plant Licensing/
Renewal Projects
General Electric Company
175 Curtner Avenue
San Jose, California 95725

Dear Mr. Robare:

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE, LIMERICK
GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M88392 AND M88393)

By letter dated December 9, 1993, Philadelphia Electric Company (PECo) submitted an application requesting a change to the Limerick Generating Station (LGS), Units 1 and 2, Operating License Nos. NPF-39 and NPF-85 and their corresponding Appendices A.

The proposed changes to the Operating Licenses and their corresponding Appendices A reflect the planned implementation of the Power Rerate Program at LGS Units 1 and 2, and the corresponding increase in the authorized maximum reactor core power level by five percent to 3458 megawatts thermal (MWt) from the current limit of 3293 MWt.

In support of the application, PECO submitted NEDC-32225P, "Power Rerate Safety Analysis Report for Limerick Generating Station, Units 1 and 2," dated September 1993. Included in PECO's application was your affidavit requesting that NEDC-32225P be withheld from public disclosure pursuant to 10 CFR 2.790.

You stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

1. The information discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies.
2. The information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
3. The information identified by bars in the margin in the GE Report NEDC-32225P is classified as proprietary because it contains detailed results and conclusions from these evaluations, utilizing analytical models and methods, including computer codes, which GE has developed, obtained NRC approval of, and applied to perform evaluations of transient and accident events in the GE Boiling Water Reactor ("BWR"). The development and approval of these system, component, and thermal hydraulic models and

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computer codes was achieved at a significant cost to GE, on the order of several million dollars.

4. The remainder of the information in GE Report NEDC-32225P is classified as proprietary because it constitutes a confidential compilation of information, including detailed results of analytical models, methods, and processes, including computer codes, and conclusions from these applications, which represent, as a whole, an integrated process or approach which GE has developed, obtained NRC approval of, and applied to perform evaluations of the safety-significant changes necessary to demonstrate the regulatory acceptability of a given increase in licensed power output for a GE BWR. The development and approval of this overall approach was achieved at a significant additional cost to GE, in excess of a million dollars, over and above the very large cost of developing the underlying individual proprietary analyses.

We have reviewed your affidavit and the material in accordance with the requirements of 10 CFR 2.790 and, on the basis of General Electric's statements, have determined that the submitted information sought to be withheld contains trade secrets or proprietary commercial information. Therefore, NEDC-32225P, entitled "Power Reactor Safety Analysis Report for Limerick Generating Station, Units 1 and 2," marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.790(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

Sincerely,

/s/

Frank Rinaldi, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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DATE	1/18/94	1/18/94	2/25/93	01/04/93	1/29/94	3/11/93

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Sincerely,



Frank Rinaldi, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

PECO Energy Company

Limerick Generating Station,
Units 1 & 2

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