



Log # TXX-95315  
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915

C. Lance Terry  
Group Vice President

December 19, 1995

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RELOAD ANALYSIS PROGRAM  
RXE-95-001, SMALL BREAK LOSS OF COOLANT ACCIDENT ANALYSIS  
METHODOLOGY

REF: Letter logged TXX-95066, dated March 13, 1995, from  
C. L. Terry to the NRC.

Gentlemen:

The overall TU Electric reload analysis program was discussed with the NRC staff in December, 1988, and again in July, 1990. The schedule for submittal of the one remaining TU Electric topical report required to complete the program was provided in the referenced letter. Consistent with that schedule, enclosed for your review and approval is RXE-95-001-P (RXE-95-001-NP, non-proprietary), Small Break Loss of Coolant Accident (LOCA) Analysis Methodology report.

RXE-95-001 presents methodology which will be utilized in support of reload design, licensing, and operation of CPSES Units 1 and 2. The report contains a description of the EXEM PWR Small Break methodology including the computer codes, the details of the nodalization schemes, and the calculational procedures which during the analysis of a Small Break LOCA. In addition, the compliance of the TU Electric analysis with 10CFR50.46 and 10CFR50, Appendix K as well as TMI Action Item II.K.3.30 requirements of NUREG-0737 is maintained through the employment of Siemens Power Corporation approved methodology.

Approval of the enclosed report will complete the TU Electric Reload Analysis Program necessary to perform safety analysis. TU Electric intends to rely on this Small Break LOCA Analysis Methodology for the startup of Unit 1, Cycle 6, and therefore requests that the NRC review and approve the enclosed report by July 1996.

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Siemens Power Corporation (SPC) considers information contained in the report RXE-91-001-P, Small Break Loss of Coolant Accident Analysis Methodology to be proprietary. In accordance with the requirements of 10CFR2.709(B) for withholding of proprietary information from public disclosure, an Affidavit is enclosed. Correspondence with respect to the proprietary aspects of the supporting SPC Affidavit should be addressed to Siemens Power Corporation, Attention Robert A. Copeland, 2101 Horn Rapids Road, P.O. Box 130, Richland WA, 99352-0130.

Should you have any questions or comments regarding the attached report or the TU Electric Reload Analysis Program, please contact Jimmy D. Seawright, (214) 812-4375 or Whee G. Choe. (214) 812-4371.

Sincerely,

*C. L. Terry*  
C. L. Terry

By: *Roger D. Walker*  
Roger D. Walker  
Regulatory Affairs Manager

JDS/vld  
Enclosures

c - Mr. L. J. Callan, Region IV (Non Proprietary)  
Mr. W. D. Johnson, Region IV (Non Proprietary)  
Mr. T. J. Polich, NRR (Non Proprietary)  
Residen Inspectors, CPSES (Non Proprietary)

AFFIDAVIT

STATE OF WASHINGTON )  
  ) ss.  
COUNTY OF BENTON     )

I, R. A. Copeland being duly sworn, hereby say and depose:

1. I am Manager, Product Licensing, for Siemens Power Corporation ("SPC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the Texas Utilities Electric Company topical report RXE-95-001 entitled "Small Break Loss of Coolant Accident Analysis Methodology," referred to as "Document." Information contained in this Document has been classified by SPC as proprietary in accordance with the control system and policies established by SPC for the control and protection of information.

3. The Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by SPC and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as proprietary and confidential.

4. The Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document will not be disclosed or divulged.

5. The Document contains information which is vital to a competitive advantage of SPC and would be helpful to competitors of SPC when competing with SPC.

6. The information contained in the Document is considered to be proprietary by SPC because it reveals certain distinguishing aspects of SPC small break analysis methodology which secure competitive advantage to SPC for fuel design optimization and marketability, and includes information utilized by SPC in its business which affords SPC an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

7. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it valuable insights into SPC small break analysis methodology and would result in substantial harm to the competitive position of SPC.

8. The Document contains proprietary information which is held in confidence by SPC and is not available in public sources.

9. In accordance with SPC's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside SPC only as required and under suitable agreement providing for nondisclosure and limited use of the information.

10. SPC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

11. Information in this Document provides insight into SPC small break analysis methodology developed by SPC. SPC has invested significant resources in developing the methodology as well as the strategy for this application. Assuming a competitor had available the same background data and incentives as SPC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as SPC.

THAT the statements made hereinabove are, to the best of my knowledge,  
information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.

RA Copeland

SUBSCRIBED before me this 14<sup>th</sup>  
day of December, 1995.

Susan K. McCoy

Susan K. McCoy  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 1/10/96