



**Entergy
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July 22, 1992

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**PROPRIETARY INFORMATION
ENCLOSED**

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Arkansas Nuclear One - Unit 2 ^{Unit 1}
Docket No. 50-368/31.
License No. NPF-6
Safety Analysis Report
Amendment No. 10
Copies I-102 through I-111

Gentlemen:

Attached is Amendment No. 10 to the Arkansas Nuclear One Safety Analysis Report. Please update your copies of the subject manual and indicate receipt of this document by signing below and returning this memo to Arkansas Nuclear One, Document Control, at the address indicated below.

Unit 2 SAR Figure 4.2-16, "In-Core Instrument Assembly," is being replaced with a revised drawing considered proprietary by ABB Combustion Engineering. This information is being submitted under IST Affidavit pursuant to 10CFR2.790 (Attachment 1). Ten copies of this drawing are included in Attachment 2 for manuals II-102 through II-111. Please add these drawings to the proprietary volume XVI of each Unit 2 SAR.

Very truly yours,

James J. Fisicaro
Son

James J. Fisicaro
Director, Licensing

JJF/JJD/sjf
Attachments

cc: Mr. James L. Milhoan
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

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PDR ADDOCK 05000313
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*A053
1/10 Sets
w/ Prop
Drawing*

U. S. NRC
July 22, 1992
Page 2

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ATTACHMENT TO UPDATED SAR AMENDMENT NO. 10
FACILITY OPERATING LICENSE NOS. DPR-51 AND NPF-6
DOCKET NOS. 50-313 AND 50-368

This attachment lists replacement and additional pages for the subject SARs which will remain in effect for subsequent versions and modifications, unless specifically altered.

A change is indicated by beginning the affected information with ♦10♦ and ending the change with +10♦. Deletions of entire paragraphs or sections are indicated by ♦→10←♦. The amendment number is indicated at the bottom of the affected page near the left margin (♦10♦ - Amendment No. 10). Absence of such indications on a replacement page means that page was reprinted for word processing purposes only (Amendment No. 10).

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ATTACHMENT 1

AFFIDAVIT FOR ABB COMBUSTION ENGINEERING
DRAWING 310-0101

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

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

I, S. A. Toelle, depose and say that I am the Manager, Nuclear Licensing, 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 in conjunction with Entergy Operations, Inc. for withholding this information.

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

Drawing No. 310-0101 Sheet 1, Rev. 2, "In-Core Instrument Assembly,"
November 6, 1990.

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, which is owned and has been held in confidence by Combustion Engineering, is the manufacturing drawing of the in-core instrument assembly.
2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in 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 document herein is 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 reactor competitors of Combustion Engineering.
 - b. Development of this information by C-E required thousands of manhours 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 to manufacture and qualify the in-core instrument.
 - 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 the design of the in-core instrument assembly, 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.

S. A. Toelle

S. A. Toelle
Manager
Nuclear Licensing

Sworn to before me
this 21st day of July, 1992

Catherine P. McCarthy
Notary Public

My commission expires: 3/31/93

ATTACHMENT 2

UNIT 2 SAR
FIGURE 4.2-16
(10 COPIES)

ATTACHMENT 3 TO UPDATED SAR AMENDMENT NO. 10
FACILITY OPERATING LICENSE NOS. DPR-51 AND NPF-6
DOCKET NOS. 50-313 AND 50-368

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UNIT 2

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Replace With

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fig 3.6-3 sh1 through sh4

fig 3.6-13

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fig 3.6-16

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fig 3.6-42

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