



ARKANSAS POWER & LIGHT COMPANY

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November 9, 1984

2CAN118402

Director of Nuclear Reactor Regulation
ATTN: Mr. James R. Miller, Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
CPC Methodology Changes for Cycle 5

Gentlemen:

Attached for your review is CEN-288(A) "CPC Methodology Changes for Arkansas Nuclear One Unit-2 Cycle 5." This document describes CPC software changes AP&L plans to implement for cycle 5 operation. These same changes, have either previously been reviewed and approved by the NRC staff for Palo Verde-1 cycle 1 or are currently being reviewed for San Onofre-2 cycle 2. It has not yet been determined whether Technical Specification changes and/or a reload report submittal will result from these modifications. However, if such changes are required they must be approved prior to start-up from the 2R4 refueling outage, which is currently scheduled to be completed by May 1, 1985. Allowing 90 days for NRC review would require the submittal of the Technical Specification changes by February 1, 1985. Therefore, we request your approval of the attached described methodology change for ANO-2 by January 1, 1985. This will allow sufficient time for the internal processing of the Technical Specification change request, if necessary. A preliminary schedule showing these dates is contained in Table 1 of the attached report.

Due to the proprietary nature of the attached material, Combustion Engineering, Inc., has requested that certain portions of CEN-288(A) be withheld from public disclosure. To accommodate this request five copies of the proprietary and nonproprietary versions are attached. An affidavit in support of this determination is also provided.

Very truly yours,

[Handwritten signature of J. Ted Enos]

J. Ted Enos
Manager, Licensing

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PDR ADOCK 05000368
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JET/DEJ/lw
Attachments

Change:
PAO1 1/5 Prop
1/5 NP
LDR JRC FOR NTIS } Non Prop

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

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

I, J. M. West, depose and say that I am the Vice President, Nuclear Power Systems, 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 Arkansas Power & Light Company for withholding this information.

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

CEN-288(A)-P, "CPC Methodology Changes for Arkansas Nuclear One Unit 2 Cycle 5, October 1984.

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 descriptions of modifications and improvements to the Arkansas Nuclear One CPC System, 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 document 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 reactor competitors of Combustion Engineering.

b. Development of this information by C-E required thousands of man-hours 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 to develop modifications and improvements to the Arkansas Nuclear One CPC System.

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.

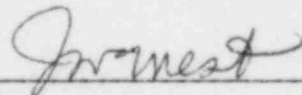
e. The information consists of descriptions of modifications and improvements to the Arkansas Nuclear One CPC System, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with 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.

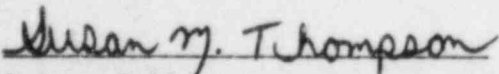
Further the deponent sayeth not.



J. M. West  
Vice President  
Nuclear Power Systems

Sworn to before me

this 23<sup>RD</sup> day of October, 1984



Notary Public

My commission expires March 31, 1988.