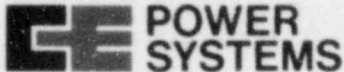


C-E Power Systems  
Combustion Engineering, Inc.  
1000 Prospect Hill Road  
Windsor, Connecticut 06095

Tel. 203/688-1911  
Telex 99297



October 18, 1985  
LD-85-049

George Knighton, Chief  
Licensing Branch No. 3  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: CPC and Methodology Changes for the CPC Improvement Program

Reference: CEN-308-P, Rev. 00-P, "CPC/CEAC Software Modifications  
for the CPC Improvement Program", August 1985

Dear Mr. Knighton:

The referenced document provides the detailed modifications to the CPC and CEAC functional design specifications resulting from the CPC Improvement Program, discussed with the NRC staff in March and April 1985. Combustion Engineering (C-E), on behalf of the CPC Oversight Committee, submitted to the NRC for staff review the referenced document via our Letter LD-85-044, dated August 30, 1985.

To assist the NRC's review of the referenced document and to provide information on the methodology changes, Enclosures (A) and (B) are submitted. Combustion Engineering is submitting these documents on behalf of the CPC Oversight Committee and is requesting NRC review of the documents on a schedule consistent with initial implementation for SONGS 2 Cycle 3 (February 1986). This submittal is only applicable to an individual licensee when the submittal is referenced by that licensee for use on its docket. Enclosure (A) has been referenced by Southern California Edison Company in their SONGS 2 Cycle 3 reload licensing submittal. It is requested that any questions you have within the scope of these submittals be addressed to the Chairman of the CPC Oversight Committee, with copies to each Committee member and C-E. The list of individuals to whom copies should be addressed is attached.

Enclosure (A) contains information considered by C-E to be proprietary in nature. As such, we request that it be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and that this material be safeguarded. The reasons for the classification of this material as proprietary are delineated in the affidavit provided in Enclosure (C).

Enclosed herewith is a check for \$150.00 to cover the application fee for review of Enclosure (A).

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NSIC } Non-Prop Only

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PDR TOPRP EMVC-E  
C PDR

Rec'd w/ check \$150.00

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3601  
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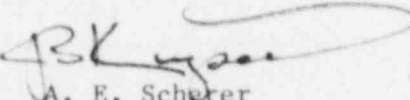
Mr. George Knighton  
October 18, 1985

LD-85-049  
Page 2

Should you have any questions on the contents of this letter, please contact me or Mr. H. C. Irwin of my staff at (203)-285-5210.

Very truly yours,

COMBUSTION ENGINEERING, INC.

 *for AES*  
A. E. Scherer  
Director  
Nuclear Licensing

AES:ss

cc: D. Fieno  
N. Lauber  
H. Rood

Attachment

- Enclosures:
- (A) CEN-310-P, "CPC and Methodology Changes for the CPC Improvement Program", October 1985: Copies 000001 thru 000009.
  - (B) CEN-310-NP, "CPC and Methodology Changes for the CPC Improvement Program", October 1985: 9 Copies attached.
  - (C) Affidavit Attesting to the Proprietary Nature of CEN-310-P.

Correspondence List

Chairman of the COLSS/CPC Oversight Committee

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Combustion Engineering, Inc.

A. E. Scherer  
Director, Nuclear Licensing  
Combustion Engineering, Inc.  
1000 Prospect Hill Road  
Post Office Box 500  
Windsor, Connecticut 06095

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

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

I, A. E. Scherer, depose and say that I am the Director, 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 for withholding this information.

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

CEN-310-P, CPC and Methodology Changes for the CPC Improvement Program,  
October 1985.

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 documents, should be withheld.

1. The information sought to be withheld from public disclosure are details of the operation of and a description of modifications to the COLSS and CPC systems, 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 tens of 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 in developing the details of operation for similiar systems.

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.

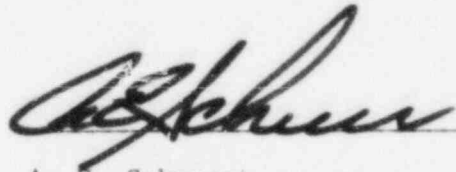
e. The information consists of details of operation of and a descripton of modifications to the COLSS and CPC systems, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with 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.

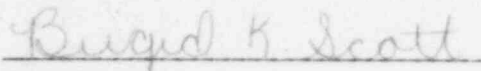
Further the deponent sayeth not.



A. E. Scherer  
Director  
Nuclear Licensing

Sworn to before me

this 16<sup>th</sup> day of October, 1985.



Notary Public

BRIGID K. SCOTT, NOTARY PUBLIC  
State of Connecticut No. 73387  
Commission Expires March 31, 1991