

SNUPPS

Standardized Nuclear Unit
Power Plant System

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Nicholas A. Petrick
Executive Director

January 8, 1986

SLNRC 86-1 FILE: 0278
SUBJ: Steam Generator Tube Rupture
Analysis - SNUPPS

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos.: STN 50-482 and STN 50-483

- References:
1. Facility Operating License NPF-30 for Callaway Plant, Unit No. 1
 2. Facility Operating License NPF-42 for Wolf Creek Generating Station, Unit No. 1

Dear Mr. Denton:

In accordance with License Condition 2.c.(11) of both references 1 and 2, enclosed is a report which demonstrates that the steam generator single-tube rupture (SGTR) analysis presented in the Final Safety Analysis Reports for the SNUPPS plants is the most severe case with respect to release of fission products and calculated radiation doses. The bases for the proposed changes to the Technical Specification requirements, that are consistent with the analysis, are included in the report. The SNUPPS Utilities will individually submit license amendment requests to incorporate the specific Technical Specification changes into Appendix A of references 1 and 2 in the future. The above license condition for both Callaway and Wolf Creek has been fulfilled with this submittal.

The enclosure to this letter contains information proprietary to the SNUPPS Utilities as discussed below. Enclosed are:

1. Three copies of SNUPPS report "Steam Generator Single Tube Rupture Analysis for SNUPPS plants - Callaway and Wolf Creek"....(Proprietary)
2. Three copies of SNUPPS report "Steam Generator Single Tube Rupture Analysis for SNUPPS plants - Callaway and Wolf Creek"....(Non-proprietary)

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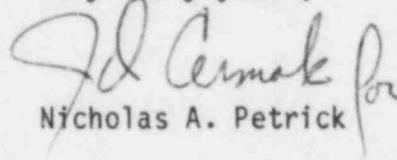
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Page 2.

Item 1 above contains information proprietary to the SNUPPS Utilities (Union Electric Company, Kansas Gas and Electric Company and Kansas City Power & Light). Therefore, this submittal is supported by an affidavit which contains a full statement of the basis for which the proprietary information may be withheld from public disclosure by the Commission. The affidavit addresses, with specificity, the considerations listed in paragraph (b)(4) of 10CFR2.790. Accordingly, it is requested that the proprietary information be withheld from public disclosure in accordance with 10CFR2.790 of the Commission's regulations.

Very truly yours,


Nicholas A. Petrick

MHF/dck/2b5&19

cc: G. L. Koester	KGE
J. M. Evans	KCPL
D. F. Schnell	UE
B. Little	USNRC/CAL
J. E. Cummins	USNRC/WC
G. C. Wright	USNRC/RIII
E. H. Johnson	USNRC/RIV

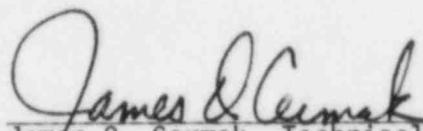
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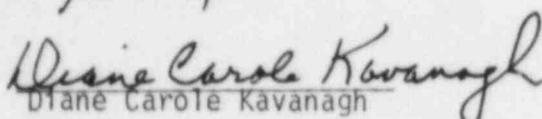
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MONTGOMERY COUNTY

Before me, the undersigned authority, personally appeared James O. Cermak, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of the SNUPPS Utilities and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:


James O. Cermak, Technical Director
SNUPPS Utilities

Sworn to and subscribed
before me this 3rd day
of January, 1986.


Diane Carole Kavanagh

My Commission Expires: 7/1/86

- (1) I am Technical Director for the Standardized Nuclear Unit Power Plant System (SNUPPS) project, representing the SNUPPS Utilities (Union Electric Company, Kansas Gas and Electric Company, and Kansas City Power and Light) and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing or rule-making proceedings, and am authorized to apply for its withholding on behalf of the SNUPPS Utilities.
- (2) I am making this Affidavit in conformance with the provisions of 10CFR Section 2.790 of the Commission's regulations and in conjunction with the SNUPPS Utilities application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by the SNUPPS Utilities in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) 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 should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by the SNUPPS Utilities. The information is of a type customarily held in confidence by other organizations and not customarily disclosed to the public.

Based on a review of 10 CFR 2.790, the information to be held in confidence falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any other company without license from the SNUPPS Utilities constitutes a competitive economic advantage over other companies.
- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage.
- (c) Its use by another company would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

There are sound reasons behind the SNUPPS Utilities position which include the following:

- (a) It is information which is marketable in many ways.
- (b) Use by other companies would put the SNUPPS Utilities at a competitive disadvantage by reducing their expenditure of resources at our expense.

- (c) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving the SNUPPS Utilities of a competitive advantage.

- (ii) The information is being transmitted to the Commission in confidence and, under the provisions of 10CFR Section 2.790, it is to be received in confidence by the Commission.

- (iii) The information sought to be protected is not available in public sources to the best of our knowledge and belief.

- (iv) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in "Steam Generator Single-Tube Rupture Analysis for SNUPPS Plants - Callaway and Wolf Creek", dated December, 1985.

The subject information could only be duplicated by competitors if they were to invest time and effort equivalent to that invested by the SNUPPS Utilities provided they have the requisite talent and experience.

Public disclosure of this information is likely to cause substantial harm to the competitive position of the SNUPPS Utilities because it would simplify design and evaluation tasks without requiring a commensurate investment of time and effort.

Further the deponent sayeth not.