



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 29, 1998

50-354

Mr. Harold W. Keiser
Chief Nuclear Officer & President
Nuclear Business Unit
Public Service Electric & Gas
Company
Post Office Box 236
Hancocks Bridge, NJ 08038

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE,
HOPE CREEK GENERATING STATION - SAFETY/RELIEF VALVE TOLERANCE
ANALYSIS (TAC NO. MA1674)

Dear Mr. Keiser:

By Public Service Electric and Gas Company's letter (LR-N97117) dated April 28, 1998, and General Electric Company's (GE) affidavit executed by George B. Stramback, dated April 22, 1998, (Attachment 4 to the letter), you submitted GE Report NEDC-32511P, "Safety Review for Hope Creek Generating Station Safety/Relief Valve Tolerance Analyses," dated April 1996, (Attachment 5 to the letter), and requested that it be withheld from public disclosure pursuant to 10 CFR 2.790.

GE stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (a) Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies.
- (b) Information which, if used by a competitor, would reduce [the] expenditure of resources or improve [the] competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
- (c) The information identified in [Attachment 5 to letter LR-N97117] is classified as proprietary because it contains detailed results of analytical models, methods and processes, including computer codes, which GE has developed, obtained NRC approval of, and applied to perform evaluations of loss-of-coolant accident for the BWR.

The development and approval of the BWR loss-of-coolant accident analysis computer codes used in this analysis was achieved at significant cost, on the order of several million dollars, to GE.

The development of the evaluation process along with the interpretation and application of the analytical results is derived from the extensive experience database that constitutes a major GE asset.

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We have reviewed your submittal and the material in accordance with the requirements of 10 CFR 2.790 and, on the basis of GE's statements, have determined that some of the information in GE report NEDC-32511P contains proprietary commercial information. However, the staff has concluded that some of the information in report NEDC-32511P that is denoted as proprietary (i.e., marked with vertical bars in the right hand margin of affected pages) should not be exempt from public disclosure and should be released and placed in the Public Document Room (PDR). The specific information that we believe should not be exempt from mandatory public disclosure is listed in the enclosure to this letter along with the reasons for our conclusions.

Therefore, we request that you review the enclosed information and submit a revised proprietary version of GE report NEDC-32511P. In addition, a nonproprietary version of the report should also be submitted to allow for proper docketing pursuant to 10 CFR 2.790(b)(1)(i). Upon receipt of this information, we will proceed with our determination as to whether the GE report should be withheld from public disclosure.

We request that the information requested above be provided within 30 days of receipt of this letter. The 30 day response timeframe was discussed with Mr. James Priest of your staff on September 9, 1998. If circumstances result in the need to revise your response date, or if you have any questions, please contact me at (301) 415-1420.

Sincerely,

original signed by:

Richard B. Ennis, Project Manager
 Project Directorate I-2
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosure: Proprietary Finding on
 GE Report NEDC-32511P

cc: See next page

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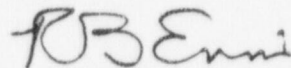
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GE Report NEDC-32511P

cc: See next page

Mr. Harold W. Keiser
Public Service Electric & Gas
Company

Hope Creek Generating Station

cc:

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c/o Mary O. Henderson, Clerk
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Trenton, NJ 08625-0415

PROPRIETARY FINDING ON GE REPORT NEDC-32511P

1) General comment

Since vertical lines in the right-hand margins were used by GE to denote proprietary information, and since a nonproprietary version of the report was not submitted, it is sometimes difficult to identify the exact portions of the text affected. It would have been better to use brackets to identify the specific text that is considered to be proprietary.

2) Page 3-1, Bullets 1 through 5 (assumptions and initial conditions)

It is not clear why some of these assumptions and initial conditions would be considered proprietary. The information in bullets 1, 2, 4, and 5 can be found on pages 3-2 and 3-3 and these pages do not have any information marked as proprietary. Either remove the marking for bullets 1, 2, 4, and 5 or provide a rationale for the staff to evaluate.

3) Page 4-1, 1st paragraph

It is not clear why the first two sentences of this paragraph are proprietary. This information does not appear to contain detailed results of analytical models, methods or processes. Either remove the marking or provide a rationale for the staff to evaluate.

4) Pages 5-1, 5-2, and 5-3, Sections 5.2 and 5.3

It is not clear why all of the text within the marked portions of Sections 5.2 and 5.3 is proprietary. The source of some of the information is from the Hope Creek Updated Final Safety Analysis Report (UFSAR) as referenced within these sections. Either remove the markings for the affected text or provide a rationale for the staff to evaluate.

5) Pages 6-2, 6-3, 6-4, 6-5, 6-8, 6-9, 6-10, 6-11, and 6-13

It is not clear why a large portion of the information in Section 6 is marked as proprietary. Much of the information does not appear to contain detailed results of analytical models, methods, or processes. For example, pages 6-4, 6-9, and 6-10 provide lists of valve numbers which should not be considered as proprietary information. In addition, this section lists design basis information which can be found in the Hope Creek UFSAR (e.g., HPCI system flow rate and HPCI design basis injection time as shown on pages 6-2 and 6-3). Either remove the markings for the affected text or provide a rationale for the staff to evaluate.

6) Page 8-1, Bullets 1 through 6 (assumptions)

It is not clear why some of these assumptions would be considered proprietary. The information in bullets 1 and 4 can be found on page 8-1 (second paragraph) and page 8-3 which are not marked as proprietary. The information in bullets 2 and 5 can be found in the Hope Creek Technical Specifications. Either remove the marking for bullets 1, 2, 4, and 5 or provide a rationale for the staff to evaluate.