Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000

May 21, 1987

Mr. Frank J. Miraglia, Director
Division of PWR Licensing - B
U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

SUBJECT: Transmittal of Revision to Both C-E Owners Group Report CEN-268, "Justification of Trip Two/Leave Two Reactor Coolant Pump Trip Strategy During Transients" and its Supplement 1-P, "Response to NRC Request for Additional Information on CEN-268"

References:
(1) R. W. Wells, Letter No. RWW-84-13 Dated February 28, 1984 to D. G. Eisenhut (NRC) Which Transmitted C-E Owners Group Report CEN-268
(2) R. W. Wells, Letter No. RWW-84-81 Dated November 30, 1984 to D. G. Eisenhut (NRC) Which Transmitted Supplement 1-P to C-E Owners Group Reports CEN-268
(3) NRC Generic Letter No. 86-06 Dated May 29, 1986, "Implementation of TMI Action Plan Item II.K.3.5., Automatic Trip of Reactor Coolant Pumps"
(4) J. Gasper, Letter Dated January 29, 1987 to F. J. Miraglia (NRC) Describing C-E Owners Group Plans To Revise Report CEN-268 and Its Supplement
(5) J. K. Gasper, Letter Dated October 23, 1986 to F. J. Miraglia (NRC) on Communications Between the CEOG and the NRC

Dear Mr. Miraglia:

References 1 and 2 submitted C-E Owners Group report CEN-268 and its supplement to the NRC for review in response to TMI Action Item II.K.3.5. The NRC subsequently issued a Safety Evaluation in Reference 3 which concluded that the information provided in support of the trip two/leave two reactor coolant pump trip strategy was acceptable. The purpose of this letter is to provide a revised version of report CEN-268 and its supplement.

During the December 11, 1986 CEOG/NRC activities status meeting, we discussed that an error had been found in Report CEN-268. This error is associated with the expected response of containment radiation during a small break LOCA. Containment radiation is one of the parameters identified in this report which can be used in the logic for tripping the second two reactor coolant pumps. During the December meeting, the staff indicated that the CEOG should revise and re-submit this report. Reference 4 provided the CEOG plans in response to this input.

see Attached Dist 2222

The enclosed revisions to Report CEN-268 and its supplement have incorporated the corrections necessary to address the error which was found. The changes made to both documents are identified by a vertical bar in the side margin of the affected pages. The revised documents continue to support the trip two/leave two strategy for RCP operation during depressurization events. The C-E Owners Group believes that the conclusions presented in the NRC's Safety Evaluation for Report CEN-268 remain appropriate.

Please note that the supplement to CEN-268 contains proprietary information; we request that it be withheld from public disclosure in accordance with the provisions of 10CFR2.790 and that this material be safeguarded. The proprietary affidavit attesting to the appropriateness of the classification and delineating the reason for it is enclosed.

This letter is provided according to terms stated in Reference 5, a copy of which is enclosed for your convenience. In particular, the commitments stated in this letter are not applicable to any individual licensee or license applicant until the letter is referenced by that licensee or license applicant for use in his docket. Please send copies of any correspondence concerning this submittal to individuals identified in the enclosed list.

If you have any questions regarding this information, please contact me.

Sincerely,

J K Gasper

J. K. Gasper
Chairman, Combustion Engineering Owners Group

JKG:ket

cc: D. Crutchfield, NRC

Enclosures:
(1) Revision 01 to Report CEN-268, "Justification of Trip Two/Leave Two Reactor Coolant Pump Trip Strategy During Transients", March 1987 (5 copies enclosed)
(2) Revision 01 to CEN-268 Supplement 1-P, "Response to NRC Request For Additional Information on CEN-268", March 1987 (Proprietary Copies 0001 through 0005)
(3) Revision 01 to CEN-268 Supplement 1-NP, "Response to NRC Request For Additional Information on CEN-268, March 1987 (5 copies enclosed)

Enclosures: (continued)

(4) J. K. Gasper, Letter Dated October 23, 1986 to F. J. Maraglia (NRC) on Communications Between the CEOG and the NRC
(5) CEOG Representatives List
(6) Proprietary Affidavit for Revision to CEN-268 Supplement 1-P

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102-2247
402/536-4000

October 23, 1986

Mr. Frank Miraglia, Director
Division of PWR Licensing --B
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Miraglia:

Subject: Communications between the Combustion Engineering Owners Group and the Nuclear Regulatory Commission

The purpose of this letter is to inform you that I have recently replaced Mr. R. W. Wells of Northeast Utilities as Chairman of the Combustion Engineering Owners Group (CEOG). The other officers of the CEOG are as follows:

Vice Chairman	Ed Sterling, Arizona Public Service
Steering Committee Members in Addition to Chairman and Vice Chairman	Mike Meisner, Louisiana Power & Light Ralph Phelps, So. California Edison Tom Cogburn, Arkansas Power & Light
Regulatory Response Group Chairman	Ted Enos, Arkansas Power & Light
Vice Chairman	Mark Medford, So. California Edison

Concurrent with informing you of my appointment, the CEOG has requested that I take this opportunity to reaffirm its established policy regarding the subject of communications. This policy has assisted in reducing the uncertainty in determining the communicants on issues and thereby improved the effectiveness of all parties concerned.

Submittals made by the CEOG to the NRC are not applicable to any individual licensee until the submittal is referenced by that licensee for use on his docket. Should the NRC have questions within the scope of any CEOG submittal, they should be addressed to the Owners Group Chairman, with copies to the appropriate Owners Group Subcommittee chairman, C-E and each Owners Group member. The individuals to whom copies should be addressed will be identified with each Owners Group submittal.

Questions from the NRC on issues beyond the scope of previous submittals made by the CEOG should be addressed only to the individual licensees. The licensees will then consider the extent of the CEOG involvement, if any, in an appropriate response.

At times in the past, the NRC has provided items to the CEOG Chairman for the information and use of CEOG members. Such items should now be sent to me with a copy to C-E (James W. Pfeifer).

The CEOG feels that this communications policy serves the best interests of the Owners Group, individual licensees and the NRC.

If you or your staff have any questions concerning this topic, or any topic pertaining to the CEOG, please contact me at (402)536-4555. If sending Federal Express, our street address is 1623 Harney Street, Omaha, NE 68102.

Sincerely,

J. K. (Joe) Gasper
Chairman
C-E Owners Group

JKG/jb

cc: Dennis Crutchfield, NRC
Harold Denton, NRC

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-268 Revision 1, Supplement 1-P, Revision 1-P, - Response to NRC Request For Additional Information On CEN-268, May 1987.

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 of 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 is an advanced best estimate Small Break Loss of Coolant Accident analytical computer model, 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 hundreds of man hours and tens 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 related to the development of an advanced best estimate Small Break Loss of Coolant Accident analytical computer model.

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 an advanced best estimate Small Break Loss of Coolant Accident analytical computer model, 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 4th day of June, 1987.

Susanne Smith
Notary Public

ENCLOSURE 5

COMBUSTION ENGINEERING OWNERS GROUP

UTILITY REPRESENTATIVES

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