

SIEMENS

November 22, 1999
NRC:99:048

Proj 702

Document Control Desk
ATTN: Chief, Planning, Program and Management Support Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Request for Review of EMF-2310(P) Revision 0, "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors"

Fifteen proprietary and 12 nonproprietary copies of topical report EMF-2310(P) Revision 0, "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors" are being submitted to the NRC for review and acceptance for referencing in licensing actions. (NOTE: Three proprietary copies and one nonproprietary copy have been sent directly to Mr. N. Kalyanam).

The topical report describes a revised SPC Pressurized Water Reactor non-LOCA transient analysis methodology that incorporates S-RELAP5 as the systems analysis code in place of ANF-RELAP. The methodology applies to all PWR non-LOCA transients, including Main Steamline Break.

The objective in using S-RELAP5 is to apply a single advanced version of an industry recognized code for all analyses, including LOCA and non-LOCA events. Using a single code that has had extensive review permits the development of one base input deck for the analysis of all events for a particular application. The benefits of using a single code include ease of use by engineers, reduced maintenance requirements, improved quality of both code and applications, and reduction of resources for the NRC review of associated methodology.

It is requested that the NRC approve this report by September 30, 2000, to support plant analyses performed by SPC for its PWR customers.

Siemens Power Corporation considers some of the information contained in the enclosure to this letter to be proprietary. As required by 10 CFR 2.790(b), an affidavit is enclosed to support the withholding of this information from public disclosure.

Very truly yours,

James F. Mallay
James F. Mallay, Director
Regulatory Affairs

Enclosures

cc: Mr. R. Caruso
Mr. N. Kalyanam (w/Enclosures)
Mr. J. L. Wermiel
Project No. 702 (w/Enclosures)

Change: POR^{4r} 1
Encl w/out Prop (NP)

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12 Non Prop

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POL TDPRP

A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, Jerald. S. Holm, being duly sworn, hereby say and depose:

1. I am Manager, Product Licensing, for Siemens Power Corporation ("SPC"), and as such I am authorized to execute this Affidavit.
2. I am familiar with SPC's detailed document control system and policies which govern the protection and control of information.
3. I am familiar with the SPC information included in report EMF-2310(P), Revision 0, "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors," referred to as "Document" transmitted by letter NRC:99:048. Information contained in this Document has been classified by SPC as proprietary in accordance with the control system and policies established by SPC for the control and protection of proprietary and confidential information.
4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by SPC and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as proprietary and confidential.
5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document will not be disclosed or divulged.

6. This Document contains information which is vital to a competitive advantage of SPC and would be helpful to competitors of SPC when competing with SPC.

7. The information contained in the Document is considered to be proprietary by SPC because it reveals certain distinguishing aspects of SPC licensing methodology which secure competitive advantage to SPC for product optimization and marketability, and includes information utilized by SPC in its business which affords SPC an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

8. The disclosure of the proprietary information contained in this Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it valuable insights into SPC licensing methodology and would result in substantial harm to the competitive position of SPC.

9. This Document contains proprietary information which is held in confidence by SPC and is not available in public sources.

10. In accordance with SPC's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside SPC only as required and under suitable agreement providing for nondisclosure and limited use of the information.

11. SPC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

12. Information in this Document provides insight into licensing methodology developed by SPC. SPC has invested significant resources in developing the methodology as well as the strategy for this application. Assuming a competitor had available the same

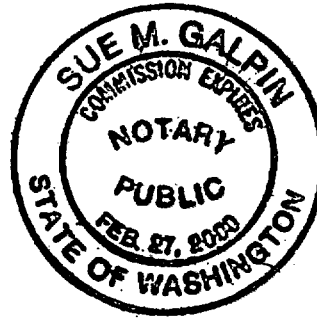
background data and incentives as SPC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as SPC.

13. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Jerald S. Holm

SUBSCRIBED before me this 22nd
day of November, 1999.

Sue M. Galpin



Sue M. Galpin
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 02/27/00