

December 7, 1999

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT**  
**TRANSMITTAL OF RELAP INPUT DECK FOR THE PALISADES LOSS OF**  
**EXTERNAL LOAD ANALYSIS**

The NRC has asked that the Palisades Plant forward Palisades specific thermal/hydraulic data which could be used by the NRC to reevaluate 10CFR50.61 Pressurized Thermal shock (PTS) and thereby potentially extend the date that Palisades reaches the PTS screening criteria. In order for the NRC to run calculations using RELAP5 for Palisades, Consumers Energy requested that Siemens Power Corporation (SPC) provide an input deck for ANF-RELAP, with accompanying documentation, that the NRC can use as a starting point for this reevaluation effort. SPC has provided that information to Consumers Energy and has requested the information be controlled as proprietary.

As required by 10CFR 2.790(b), an affidavit from Siemens Power Corporation is enclosed (Attachment 1) to support the withholding of the proprietary information contained in the SPC input deck for ANF-RELAP.

The enclosed 3.5 inch diskette (Enclosure 1) contains the propriety ANF-RELAP input deck used for the Palisades LOEL analysis. The applicable calculation notebooks which describe the development of this input deck will be submitted at a later date.

PDL ADDOK 05000255

change: NRC PDL

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encl 1  
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AP01

SUMMARY OF COMMITMENTS

This letter contains no new commitments and no revisions to existing commitments.



Nathan L. Haskell  
Director, Licensing

CC Administrator, Region III, USNRC (w/o Enclosure)  
Project Manager, NRR, USNRC  
NRC Resident Inspector - Palisades (w/o Enclosure)

Attachment  
Enclosure

**ATTACHMENT 1**

**CONSUMERS ENERGY COMPANY  
PALISADES PLANT  
DOCKET 50-255**

**December 7, 1999**

**AFFIDAVIT TO SUPPORT WITHHOLDING  
OF SIEMENS POWER COMPANY  
INPUT DECK FOR ANF-RELAP**

**3 Pages**



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.

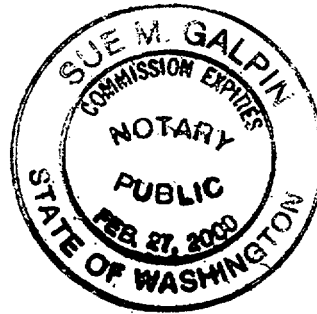
13. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Gerald S. Helm

SUBSCRIBED before me this 2<sup>nd</sup>  
day of December, 1999.

Sue M. Galpin

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



**Siemens**

Filename: palloel - ss.inp

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