

March 22, 2001

Mr. Jerald S. Holm  
Manager, Product Licensing  
Framatome ANP Richland, Inc.  
2101 Horn Rapids Road  
Richland, WA 99352

SUBJECT: GRAND GULF NUCLEAR STATION - REQUEST FOR WITHHOLDING  
INFORMATION FROM PUBLIC DISCLOSURE  
RE: RESULTS SUMMARY OF MINIMUM CRITICAL POWER RATIO SAFETY  
LIMIT ANALYSIS FOR CYCLE 12 OPERATION (TAC MB0514)

Dear Mr. Holm:

By letter dated November 10, 2000, Entergy Operations, Inc. (Entergy) submitted to the U.S. Nuclear Regulatory Commission (NRC) a proposed license amendment to the Grand Gulf Nuclear Station (GGNS) technical specifications. In support of the amendment request, Entergy submitted a Safety Limit Analysis of Minimum Critical Power Ratio (MCPR) developed by Siemens Power Corporation (now Framatome ANP Richland, Inc., hereinafter referred to as FRA-ANP) for GGNS Cycle 12 operation. In its November 10, 2000, letter, Entergy requested that the MCPR Safety Limit Analysis be considered proprietary, and submitted an affidavit dated November 2, 2000, subscribed by H. Donald Curet, Manager, Product Licensing, Siemens Power Corporation. By letter dated February 15, 2001, Entergy submitted supplemental information relating to the MCPR Safety Limit Analysis. In its February 15, 2001, letter, Entergy requested that this supplemental information also be considered proprietary and submitted an affidavit dated February 7, 2001, subscribed by Jerald S. Holm, Manager, Product Licensing, FRA-ANP.

By Entergy letters dated November 10, 2000, and February 15, 2001, and included affidavits dated November 2, 2000 and February 7, 2001, Entergy requested that the MCPR Safety Analysis results summary for GGNS Cycle 12 operation be withheld from public disclosure pursuant to 10 CFR 2.790.

The affidavit dated November 2, 2000, subscribed by H. Donald Curet, and affidavit dated February 7, 2001, subscribed by Jerald S. Holm stated that the MCPR Safety Analysis information for GGNS Cycle 12 operation should be considered exempt from mandatory public disclosure for the following reasons:

- (a) The information reveals details of FRA-ANP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.

- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FRA-ANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FRA-ANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FRA-ANP, would be helpful to competitors to FRA-ANP, and would likely cause substantial harm to the competitive position of FRA-ANP.

We have reviewed the affidavits dated November 2, 2000, and February 7, 2001 subscribed by H. Donald Curet, and Jerald S. Holm, respectively, and the material in accordance with the requirements of 10 CFR 2.790 and, on the basis of your statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure. Therefore, the MCPR Safety Limit Analysis results summary for GGNS Cycle 12 operation included in the Entergy letter dated November 10, 2000, as supplemented by the additional information included in the Entergy letter dated February 15, 2001, will be withheld from public disclosure pursuant to 10 CFR 2.790(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-2623.

Sincerely,

**/RA/**

S. Patrick Sekerak, Project Manager, Section 1  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Project No. 702  
Docket No. 50-416

cc: See next page

- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FRA-ANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FRA-ANP in product optimization or marketability.
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