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 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362
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 MEDFORD, M.D. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Forward C-E nonproprietary & proprietary, "Safety Analysis
 & CPC Methodology Changes for San Onofre Nuclear Generating
 Station Units 2 & 3" & "CPC/CEAC Software Mods...."
 Proprietary repts withheld (ref 10CFR2.790).

See subject files
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Southern California Edison Company



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M.O. MEDFORD
MANAGER, NUCLEAR LICENSING

July 20, 1984

TELEPHONE
(213) 572-1749

Director, Office of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

SCE met with the NRC Staff on June 29, 1984 in Bethesda, Maryland to discuss the following Core Protection Calculator (CPC) software and methodology changes which will be incorporated into Cycle 2 of SONGS Units 2 and 3:

- o Minor Calculational and Constant Changes
- o Enhancements to Thermal Margin
- o CPC Performance Enhancement

The algorithm changes which are being incorporated with the software changes revise ordinary data base constants to accommodate the Cycle 2 core design. In addition, certain methodology changes being introduced into the Cycle 2 analyses are evolutionary in nature and represent either small adjustments to the methodology used to calculate constants or small differences in the algorithms themselves and many of the modifications have already been implemented for CESSAR Plants.

The June 29, 1984 meeting focused primarily on SONGS Unit 2 because of the close proximity of the scheduled first refueling outage. It is expected that the SONGS Unit 2 Cycle 2 CPC changes will be identical to those changes for SONGS Unit 3 Cycle 2 and therefore all changes discussed are considered to be applicable to Cycle 2 operation for both Units 2 and 3. Since much of the information presented during the June 29, 1984 meeting was proprietary in nature to Combustion Engineering Inc. (CE), the NRC staff was not able to retain copies of the handouts utilized. This letter formally transmits copies of (1) a report containing the June 29, 1984 meeting handouts and a summary of the presentation and (2) a report describing changes to the SONGS Units 2 and 3 CPC/CEAC software for Cycle 2 operation in order to facilitate early NRC notification of methodology and software changes.

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*Approved
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3/20/84 Prop
Dated*

July 20, 1984

Accordingly, please find enclosed three (3) copies of each of the following proprietary Combustion Engineering documents including affidavits setting forth the basis on which the information may be withheld from public disclosure by the Commission and addressing specifically the considerations listed in 10 CFR 2.790(b) of the Commission's regulations.

Enclosure 1. CEN-284(S)-P, Safety Analysis and CPC Methodology Changes for SONGS Units 2 and 3, June 1984. (Copy Nos. 000001, 000002 and 000003.)

Enclosure 1 includes the slides and a summary of the June 29, 1984 presentation to the NRC by SCE and CE.

Enclosure 2. CEN-281(S)-P, CPC/CEAC Software Modifications, SONGS Units 2 and 3, July 1984. (Copy Nos. 000001, 000002 and 000003.)

Enclosure 2 describes the modifications to the CPC/CEAC Cycle 2 software for SONGS Units 2 and 3.

It is respectfully requested that the above information which is proprietary to CE be withheld from public disclosure in accordance with 10 CFR 2.790(b) of the Commission's regulations. If you should have any questions concerning the proprietary nature of the material transmitted herewith, please address these questions directly to:

Mr. A. E. Scherer
Director, Nuclear Licensing
Combustion Engineering Inc.
1000 Prospect Hill Road
Windsor, Connecticut 09095

It is also requested that you provide a copy of the questions concerning the proprietary nature of this submittal to SCE and SDG&E.

Three (3) copies of the following nonproprietary versions of Enclosures 1 and 2 are also enclosed to satisfy the requirements for transmittal of proprietary information to the NRC:

Enclosure 3. CEN-284(S)-NP, Safety Analysis and CPC Methodology Changes for SONGS Units 2 and 3, June 1984.

Enclosure 4. CEN-281(S)-NP, CPC/CEAC Software Modifications for SONGS Units 2 and 3, July 1984.

The enclosed documentation constitutes early notification, to the NRC, of CPC software and methodology changes which will be incorporated into Cycle 2 for SONGS Units 2 and 3. The purpose of the June 29, 1984 meeting and the enclosed documentation is to provide the NRC with early notice of methodology changes in order to facilitate timely NRC review and approval of

Mr. G. W. Knighton

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July 20, 1984

the forthcoming Cycle 2 Reload Analysis and related Technical Specification changes required to support Cycle 2 operation. SCE is also available to assist the NRC Staff's timely review and approval of the enclosed information.

If you have any questions or comments, please let me know.

Very truly yours,



Enclosures

cc: Harry Rood, NRC Project Manager (to be opened by addressee only -
Enclosure 1 Copy No. 000004, Enclosure 2 Copy No. 000004)

Y. Hsui, NRC Core Performance Branch (to be opened by addressee only -
Enclosure 1 Copy No. 000005, Enclosure 2 Copy No. 000005)

A. E. Chaffee, NRC Resident Inspector (Enclosures 3 and 4 only)

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 and in conjunction with the application of Southern California Edison Company for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

CEN-281 (S)-P, CPC/CEAC Software Modifications for San Onofre Nuclear Generating Station Units 2 and 3, June 1984.

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 or 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 are algorithm changes and data base constants for software modifications to the San Onofre CPC/CEAC System, 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 tens of thousands of manhours of effort and hundreds 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 in developing algorithms and constants for the San Onofre CPC/CEAC system.

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 algorithm changes and data base constants for software modifications to the San Onofre CPC/CEAC System, 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.

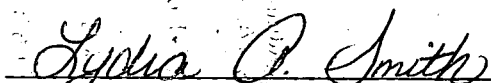
g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.



A. E. Scherer
Director
Nuclear Licensing

Sworn to before me
this 6th day of July


Notary Public

LYDIA A. SMITH, NOTARY PUBLIC
STATE OF CONNECTICUT No. 68542
COMMISSION EXPIRES MARCH 31, 1989

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

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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 or 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 are descriptions of modifications and improvements to the San Onofre CPC/CEAC System, 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.

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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 thousands of man-hours of effort 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 to develop modifications and improvements to the San Onofre CPC/CEAC System.

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.

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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 10th day of July 1984



Notary Public

LYDIA A. SMITH, NOTARY PUBLIC
STATE OF CONNECTICUT No. 68542
COMMISSION EXPIRES MARCH 31, 1989

ENCLOSURE 1

ENCLOSURE 3