

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9402100014 DOC. DATE: 94/02/02 NOTARIZED: YES DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH. NAME AUTHOR AFFILIATION
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION

Document Control Branch (Document Control Desk) *See Rpt.*

SUBJECT: Forwards Central Files version of response to RAI re
 power uprate review (TAC M87076). Withheld.

DISTRIBUTION CODE: AP01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7+ 106
 TITLE: Proprietary Review Distribution - Pre Operating License & Operating R

NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES		
	ID	CODE/NAME	LTTR	ENCL		ID	CODE/NAME	LTTR	ENCL	
	PDV	LA	1	1		PDV	PD	1	1	
	CLIFFORD, J		3	3						
INTERNAL:	ACRS		6	6		AEOD/DOA		1	1	
	OGC/HDS1		1	0		<u>REG-FILE</u>	01	1	1	
EXTERNAL:	NRC	PDR	1	0						

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 15 ENCL 13

MA2



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

February 2, 1994
G02-94-029

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION,
POWER UPRATE REVIEW (TAC M87076)**

Reference: Letter, dated November 9, 1993, JW Clifford (NRC) to JV Parrish (SS),
"Request for Additional Information, Power Uprate Review (TAC M87076)"

Attachment 1 provides the response to the request for additional information included with the reference.

Sincerely,

J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations

WCW/bk
Attachments

cc: KE Perkins - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector - 927N

080068

7402100014 740202
PDR ADDCK 05000397
P PDR

AP01
1/1

6: 00 PM

ATTACHMENT 1

REQUEST

The Supply System submittal does not discuss the instrument setpoint methodology, and the staff has been unable to determine whether the GE setpoint methodology discussed in GE Topical Report NEDC-31336 is used, or a plant-specific setpoint methodology has been used for this application.

If a plant-specific methodology is used, then provide the following information:

- a. A description of the setpoint methodology used and how it differs from NEDO-31336¹.*
- b. Include reference to the setpoint methodology in the report.*
- c. Calculations and related documents that were utilized to derive the new trip setpoint and allowable values for the following parameters:*
 - 1) Reactor vessel steam dome pressure, high*
 - 2) Flow biased simulated thermal power, high*
 - 3) Main steam line flow, high*

If the GE NEDO-31336¹ setpoint methodology is used, then provide the following information:

- a. Include reference to the GE report in your submittal.*
- b. The staff's Safety Evaluation Report (SER) on GE Topical Report NEDO-31336 identified plant-specific information that was needed to justify the application of the GE report. Provide the necessary information, identified in the staff SER, to justify the applicability of the GE report to WNP-2.*
- c. Calculations and related documents that were utilized to derive the new trip setpoint and allowable values for the following parameters:*
 - 1) Reactor vessel steam dome pressure, high*
 - 2) Flow biased simulated thermal power, high*
 - 3) Main steam line flow, high*

Alternatively, if GE methodology is used, you can confirm that the calculations for these setpoints are identical to another plant that has been previously reviewed and approved by staff. As another alternative, if your calculations are not identical to another plant, you can provide a comparison to another plant's calculations and justify the differences.

¹ All references to "NEDO-31336" should be "NEDC-31336"

RESPONSE

WNP-2 is using the GE NEDC-31336 setpoint methodology.

- a) Updated pages (5-2 and 5-6) for NEDC-32141P which include a reference to NEDC-31336 are attached.
- b) The Supply System has chosen the alternative of comparing the WNP-2 calculations to those of another plant (FERMI 2) with a justification of the differences. The basic differences between the NRC approved Fermi 2 power uprate setpoint calculations and the WNP-2 calculations are as follows:

The basic differences in the calculation results are due to different types of instruments installed at the plants. Fermi 2 has Rosemount transmitters and trip units installed for the functions while WNP-2 has switch devices. Since the switch devices typically do not have drift specifications, the WNP-2 plant specific analysis is based on WNP-2 field data to confirm instrument drift assumptions. Details of the computer program used to perform the drift confirmation analysis are contained in BWR Owner's Group Licensing Topical Report Calibration Interval Extension, NEDC-32160P. In addition, site specific calibration surveillance procedures for both plants were used and, because WNP-2 uses switch type devices, the calibration procedural errors are larger. There are minor differences in the type of calibration equipment used at the two plants (i.e., different models of Flukes).

- c) Attached are the WNP-2 plant unique setpoint calculations requested by the NRC. They were performed by GE based on the setpoint methodology documented in the NRC approved "General Electric Instrument Setpoint Methodology," NEDC-31336.

Differences from Fermi 2 setpoint calculations are as follows:

- 1) Reactor vessel steam dome pressure, high — WNP-2 uses a pressure switch device, therefore a drift analysis was performed rather than using vendor published drift values.
- 2) Flow biased simulated thermal power, high — Average Power Range Monitor (APRM) Gain Adjustment Factor (AGAF) allowance in calibration is required for WNP-2. Also a plant specific neutron noise analysis was performed.
- 3) Main steam line flow, high — WNP-2 uses a different pressure switch; therefore, a drift analysis was performed because vendor published drift values do not exist.

General Electric Company

AFFIDAVIT

I, David J. Robare, being duly sworn, depose and state as follows:

- (1) I am Project Manager, Plant Licensing/Renewal Projects, General Electric Company ("GE") and have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) The information sought to be withheld is contained in the GE proprietary report GE-NE-208-23-1293-1, *Power Uprate Condition Setpoint Calculations For The Washington Public Power Supply System WNP-2*, GE Proprietary Information, dated December 1993. The proprietary information is delineated by bars marked in the margin adjacent to the specific material.
- (3) In making this application for withholding of proprietary information of which it is the owner, GE relies upon the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), 2.790(a)(4), and 2.790(d)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The material for which exemption from disclosure is here sought is all "confidential commercial information", and some portions also qualify under the narrower definition of "trade secret", within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).
- (4) Some examples of categories of information which fit into the definition of proprietary information are:
 - a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies;
 - b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product;

- c. Information which reveals cost or price information, production capacities, budget levels, or commercial strategies of General Electric, its customers, or its suppliers;
- d. Information which reveals aspects of past, present, or future General Electric customer-funded development plans and programs, of potential commercial value to General Electric;
- e. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in both paragraphs (4)a. and (4)b., above.

- (5) The information sought to be withheld is being submitted to NRC in confidence. The information is of a sort customarily held in confidence by GE, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GE, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.
- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within GE is limited on a "need to know" basis.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist or other equivalent authority, by the manager of the cognizant marketing function (or his delegate), and by the Legal Operation, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside GE are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
- (8) The information identified in paragraph (2), above, is classified as proprietary because it contains detailed results of analytical models, methods and processes, including computer codes, which GE has developed, obtained NRC approval of, and applied to perform evaluations of the plant instrumentation

calibration based on GE's instrument setpoint methodology.

The development and approval of the instrument setpoint methodology and computer codes used in this analysis was achieved at a significant cost, on the order of a million dollars, to GE.

The development of the evaluation process along with the interpretation and application of the analytical results is derived from the extensive experience database that constitutes a major GE asset.

- (9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to GE's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of GE's comprehensive BWR safety and technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology and includes development of the expertise to determine and apply the appropriate evaluation process. In addition, the technology base includes the value derived from providing analyses done with NRC-approved methods.

The research, development, engineering, analytical and NRC review costs comprise a substantial investment of time and money by GE.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

GE's competitive advantage will be lost if its competitors are able to use the results of the GE experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to GE would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive GE of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing these very valuable analytical tools.

STATE OF CALIFORNIA)
)
COUNTY OF SANTA CLARA)

SS:

David J. Robare, being duly sworn, deposes and says:

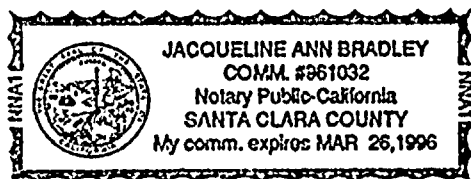
That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at San Jose, California, this 27TH day of DECEMBER 1993.

David J. Robare

David J. Robare
General Electric Company

Subscribed and sworn before me this 27 day of December 1993.



Jacqueline Ann Bradley
Notary Public, State of California

12/21/93RTH

710

YOUNG MEN'S CHRISTIAN ASSOCIATION
OF THE CITY OF NEW YORK
100 WEST 42ND STREET
NEW YORK, N. Y. 10018
TELEPHONE: 244-1234