

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9804300263      DOC. DATE: 98/04/24      NOTARIZED: YES      DOCKET #  
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power      05000397  
 AUTH. NAME      AUTHOR AFFILIATION  
 COLEMAN, D.W.      Washington Public Power Supply System      *See Report*  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Document Control Branch (Document Control Desk)

SUBJECT: Submits proprietary & non-proprietary info re request for  
 amend to TS to establish safety limits for Cycle 14. Encls  
 contain info re effects of channel bow & changing core  
 design on safety limits. Proprietary info withheld.

DISTRIBUTION CODE: A001D      COPIES RECEIVED: LTR 1 ENCL 1      SIZE: 6+79  
 TITLE: OR Submittal: General Distribution

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD4-2 LA	1 1	PD4-2 PD	1 1
POSLUSNY, C	1 1		
INTERNAL: ACRS	1 1	<u>FILE CENTER</u> 01	1 1
NRR/DE/ECGB/A	1 1	NRR/DE/EMCB	1 1
NRR/DRCH/HICB	1 1	NRR/DSSA/SPLB	1 1
NRR/DSSA/SRXB	1 1	NUDOCS-ABSTRACT	1 1
OGC/HDS3	1 0		
INTERNAL: NOAC	1 1	NRC PDR	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS  
 OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL  
 DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 14 ENCL 13

C  
A  
T  
E  
G  
O  
R  
Y  
  
1  
  
D  
O  
C  
U  
M  
E  
N  
T



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

April 24, 1998  
GO2-98-063

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT  
SUBMITTAL OF ADDITIONAL INFORMATION**

- References:
- 1) Letter GO2-97-219 dated December 4, 1997, PR Bemis (Supply System) to NRC, "Request for Amendment, Minimum Critical Power Ratio Safety Limits"
  - 2) Letter GO2-98-042 dated March 3, 1998, DW Coleman (Supply System) to NRC, "Request for Amendment, Submittal of Additional Information"
  - 3) Letter GO2-98-049 dated March 9, 1998, PR Bemis (Supply System) to NRC, "Request for Amendment of SLMCPR - Modification of Request"
  - 4) Letter ABBWP-98-021 dated April 15, 1998, RM Matheny (ABB) to RA Vopalensky (Supply System), "Clarification of WNP-2 Cycle 14 SLMCPR Evaluation" (attached)
  - 5) CENPD-300-P-A, Reference Safety Report for Boiling Water Reactor Reload Fuel, July 1996

A request for an amendment of the WNP-2 Technical Specifications to establish safety limits for Cycle 14 was submitted by the Supply System in December 1997 (Reference 1). Additional information describing the methodology used for safety limit calculations was transmitted by Reference 2. The Supply System's original amendment request was modified by Reference 3 to address issues identified by the NRC. This letter and its attachments contain information regarding the effect of channel bow and changing core design on the safety limits proposed for adoption in the amendment request.

Since the submittal of the original amendment request, the Cycle 14 reference core design has been modified to reflect the revised Cycle 13 energy production. The changes in the core design have been documented in the Cycle 14 Reload Design Report WNP2-FTS-148 dated January, 1998 (Attachment 1). The Cycle 14 reload will now be comprised of 132 ABB SVEA-96 new

9804300263 980424  
PDR ADOCK 05000397  
P PDR

1/1  
A001



REQUEST FOR AMENDMENT  
SUBMITTAL OF ADDITIONAL INFORMATION

Page 2

fuel assemblies, 216 irradiated ABB SVEA-96 assemblies, and 416 irradiated SPC ATRIUM-9X assemblies. This information supersedes the original Cycle 14 core load projections reported in the original amendment request (see Attachment 1 of Reference 1).

Differences in cycle length or fuel inventory between the reference core and the as-loaded core are evaluated in accordance with the methodology described in section 4.3 of Reference 5. The revisions to the Cycle 14 core design noted above have been evaluated by ABB and do not affect the values of the safety limits proposed in the amendment request (Reference 4).

To ensure sufficiently conservative operating limits for the Siemens ATRIUM-9X fuel in Cycle 14, the calculation of  $\Delta$ CPR includes the application of a conservative adder as described in the Operating License condition imposed by Amendment 151. The Supply System currently anticipates using the interim safety limits for the ATRIUM-9X fuel for the duration of Cycle 14.

The previous conclusion of no significant hazards that was evaluated in accordance with 10CFR50.92(c) and documented in Reference 1 is not changed by the information contained in this submittal. The supplemental information provided by this letter has also been evaluated against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. The proposed changes still meet the criteria for categorical exclusion as described in 10CFR51.22(b) and 10CFR51.22(c)(9). An environmental assessment of the proposed change is not required.

Some of the information contained in Attachment 2 has been identified as proprietary to ABB Combustion Engineering. In accordance with the requirements of 10 CFR 2.790, an affidavit is enclosed to support the withholding of this information from public disclosure.

Should you have any questions or desire additional information regarding this matter, please contact Mr. P.J. Inserra at (509) 377-4147.

Respectfully,



D.W. Coleman (Mail Drop PE20)  
Acting Manager, Regulatory Affairs

Attachments: 1) WNP2-FTS-148, Cycle 14 Reload Design Report, January 1998  
2) Letter ABBWP-98-021, dated April 16, 1998

cc: EW Merschoff - NRC RIV  
KE Perkins, Jr. - NRC RIV, WCFO  
C Poslusny, Jr. - NRR  
NRC Resident Inspector - 927N

T Huang - NRR  
JE Whittemore - NRC RIV  
DL Williams - BPA  
PD Robinson - Winston & Strawn

10-5-4

AFFIDAVIT

STATE OF WASHINGTON )  
COUNTY OF BENTON )

Subject: Attachment to ABBWP-98-021,  
"Clarification of WNP-2 Cycle 14  
SLMCPR Evaluation," dated April  
15, 1998.

I, D.W. Coleman, being duly sworn, subscribe to and say that I am the Acting Manager, Regulatory Affairs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

The attachment to this letter contains information [marked in brackets] which is considered by ABB Combustion Engineering to be proprietary.

Attached is an affidavit executed by Mr. I.C. Rickard, Director, Nuclear Licensing, for Combustion Engineering, Inc., dated April 16, 1998, which provides the basis on which it is claimed that the subject document should be withheld from public disclosure under the provisions of 10 CFR 2.790.

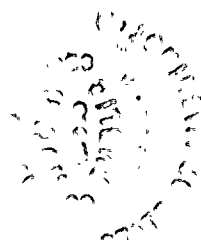
The Washington Public Power Supply System treats the subject document as proprietary information on the basis of statements by its owner. In submitting this information to the NRC, the Supply System requests that the subject document be withheld from public disclosure in accordance with 10 CFR 2.790.

DATE April 24, 1998

D.W. Coleman  
D.W. Coleman, Acting Manager  
Regulatory Affairs

On this date personally appeared before me D.W. COLEMAN, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 24 day of April, 1998.



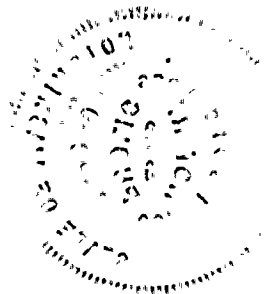
[Signature]  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires 4/28/98

13

1968





AFFIDAVIT PURSUANT

TO 10 CFR 2.790

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

I, Ian C. Rickard, 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 conjunction with the application of Washington Public Power Supply System and in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations.

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

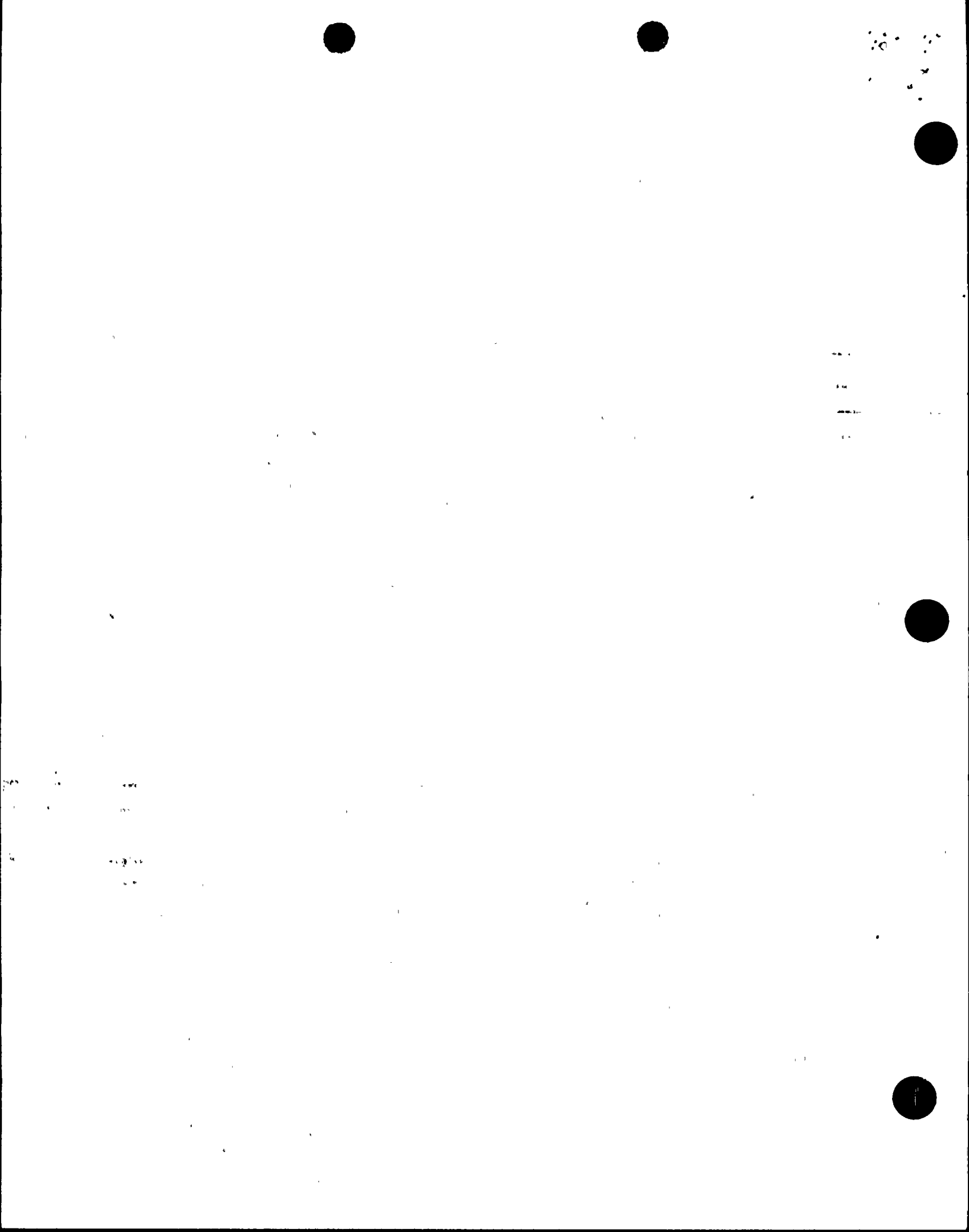
Attachment to ABBWP-98-021, "Clarification of WNP-2 Cycle 14 SLMCPR Evaluation", April 15, 1998.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering, Inc. 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, which is owned and has been held in confidence by Combustion Engineering, Inc. It consists of information concerning analysis methodology details and calculation details for the Safety Limit Minimum Critical Power Ratio evaluation.



2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to Combustion Engineering, Inc.

3. The information is of a type customarily held in confidence by Combustion Engineering, Inc. and not customarily disclosed to the public. Combustion Engineering, Inc. 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 is 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, Inc. because:

- a. A similar product is manufactured and sold by major light water reactor competitors of Combustion Engineering, Inc.
- b. Development of this information by Combustion Engineering, Inc. required tens of thousands of manhours and hundreds of thousands of dollars. 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 the analysis methodology details and calculation details for the Safety Limit Minimum Critical Power Ratio evaluation.

- d. The information consist of analysis methodology details and calculation details for the Safety Limit Minimum Critical Power Ratio evaluation, 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, Inc., take marketing or other actions to improve their product's position or impair the position of Combustion Engineering, Inc.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- e. In pricing Combustion Engineering, Inc.'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.
- f. 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, Inc.'s potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.

  
\_\_\_\_\_  
Ian C. Rickard  
Director, Nuclear Licensing

Sworn to before me  
this 16<sup>th</sup> day of April, 1998

  
\_\_\_\_\_  
Notary Public

My commission expires: 3/31/98



12

