

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8303100345 DUC DATE: 83/03/03 NOTARIZED: YES DOCKET #
 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Public 05000528
 AUTH. NAME AUTHOR AFFILIATION
 VAN BRUNT, E.E. Arizona Public Service Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G. Licensing Branch 3

SUBJECT: Forwards proprietary & nonproprietary repts on core protection calculations & control element assembly calculators, per SER NUREG-0857. Affidavit for withholding per 10CFR2.790 encl. Proprietary repts withheld (ref 10CFR2.790).

DISTRIBUTION CODE: B001S COPIES RECEIVED: LTR 1 ENCL 25 SIZE: 1+239
 TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence
 1 15 Non prop encl. 05000528

NOTES: Standardized plant.
 See Subject Files

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1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it contains the President's message to the Congress at the beginning of his first term. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

2. The second part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it contains the President's message to the Congress at the beginning of his first term. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

3. The third part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it contains the President's message to the Congress at the beginning of his first term. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

4. The fourth part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it contains the President's message to the Congress at the beginning of his first term. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

5. The fifth part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it contains the President's message to the Congress at the beginning of his first term. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

6. The sixth part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it contains the President's message to the Congress at the beginning of his first term. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

7. The seventh part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it contains the President's message to the Congress at the beginning of his first term. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

8. The eighth part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it contains the President's message to the Congress at the beginning of his first term. The letter is written in a very formal and dignified style, and it is one of the most important documents in the history of the United States.

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Arizona Public Service Company

P.O. BOX 21666 • PHOENIX, ARIZONA 85036

March 3, 1983

ANPP-23163 - WFQ/TFQ

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

Subject: Palo Verde Nuclear Generating Station
(PVNGS) Units 1, 2 and 3
Docket Nos. STN-50-528/529/530
File: 83-056-026; G.1.01.10

References: (A) NUREG-0857, "Safety Evaluation Report related to the operation" of Palo Verde Nuclear Generating Station Units 1, 2 and 3, dated November, 1981.
(B) Letter LD-82-039, from A. E. Scherer, CE, to D. G. Eisenhower, NRC, dated March 30, 1982.

Dear Mr. Knighton:

Section 7.2.4 of Reference (A) requested plant specific data for the PVNGS Unit 1 Core Protection Calculations (CPC's) and the Control Element Assembly Calculators (CEAC's). Attached for your review are reports on the CPC/CEAC software verification testing and the PVNGS Unit 1, Cycle 1 Data Base. Reference (B) provided that portion of the CPC/CEAC system which is generic to the System 80 reactor, on the CESSAR docket. This generic submittal included:

(1) a description of the CPC software changes; (2) the CPC qualification test plan; and (3) a summary of the safety analysis for application of the CPC's in System 80 reactors.

As a result of the Phase II testing, we have identified a discrepancy between the CPC simulator and the actual software calculation of certain flow related variables. These discrepancies will be evaluated and any related errors in the CPC's will be corrected. A supplemental test report demonstrating acceptable implementation will be provided by April, 1983.

Due to the proprietary nature of the material contained in the enclosure, we request that it be withheld from public disclosure in accordance with the provisions of 10CFR 2.790 and that this material be safeguarded. The reasons

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Mr. G. Knighton
March 3, 1983
ANPP-23163 - WFQ/TFQ
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for the proprietary classification of this report are delineated in the enclosed affidavit.

Please contact me if you have any questions on this matter.

Very truly yours,



E. E. Van Brunt, Jr.
APS Vice President,
Nuclear Projects
ANPP Project Director

EEVBJr/TFQ/sp
Attachment

cc: E. A. Licitra
K. Berlin
A. C. Gehr

Attachments:

Proprietary Affidavit


CPC/CEAC System Phase I Software Verification Test Report;
CEN-217 (V), Revision 00, January 1983; -P, Proprietary Version
Copies Number 0001-0025; -NP, Non-Proprietary Version,
15 Copies

CPC/CEAC System Phase II Software Verification Test Report;
CEN-217 (V), Revision 00, January 1983; -P, Proprietary
Version,
Copies Number 0001-0025; -NP, Non-Proprietary Version,
15 Copies

PVNGS Cycle 1 CPC and CEAC Data Base Document, CEN-226(V),
Revision 00, January 1983; -P, Proprietary Version,
Copies Number 0001-0025; -NP, Non Proprietary Versions,
15 Copies

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.


Edwin E. Van Brunt, Jr.

Sworn to before me this 3rd day of March, 1983.


Notary Public

My Commission expires:

My Commission Expires May 19, 1988

THE UNIVERSITY OF CHICAGO

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 the Arizona Public Service Company, for withholding this information.

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

CEN-217(V)-P Revision 00, CPC/CEAC System Phase I Software Verification Test Report, January 1983.

CEN-219(V)-P Revision 00, CPC/CEAC System Phase II Software Verification Test Report, January 1983.

CEN-226(V)-P, PVNGS-1 Cycle 1 CPC and CEAC Data Base Document, January 1983.

These documents have 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.

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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 documents, should be withheld.

1. The information sought to be withheld from public disclosure are a description of the testing, quantitative data, test evaluation and acceptance criteria for the CPC/CEAC system software, 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 documents 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.

一、政治思想：热爱祖国，热爱社会主义，热爱中国共产党，拥护党的路线、方针、政策，遵纪守法，诚实守信，具有良好的道德品质。

二、学习情况：学习态度端正，刻苦努力，成绩优秀。在本科阶段，系统学习了马克思主义理论、中国特色社会主义理论体系、中国近现代史纲要、毛泽东思想和中国特色社会主义理论体系概论等课程，打下了扎实的理论基础。

三、社会实践：积极参加社会实践活动，深入农村、社区、企业等基层一线，了解国情民情，增长见识，锻炼能力。在实践过程中，能够运用所学知识分析问题、解决问题，增强了社会责任感。

四、工作表现：在担任学生干部期间，工作认真负责，积极主动，有较强的组织协调能力。能够团结同学，服务同学，为集体贡献智慧和力量。

五、生活作风：生活简朴，作风正派，严于律己，宽以待人。养成了良好的生活习惯和作息规律，能够自觉抵制不良诱惑，保持身心健康。

六、综合评价：该同志在本科阶段的学习、生活、工作等方面均取得了显著成绩，综合素质较高，具备较强的发展潜力。希望在今后的学习和工作中，继续发扬优点，弥补不足，为祖国的建设贡献更大的力量。

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 reactors 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 related to the development of CPC/CEAC data base and testing of CPC/CEAC software.

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 a description of the testing, quantitative data, test evaluation, and acceptance criteria for the CPC/CEAC system software, 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.

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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 day of
R. L. Olsen JAN 20 1983



Notary Public
Justice of the Peace
336 Taylor Rd.
Enfield, CT 06082

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