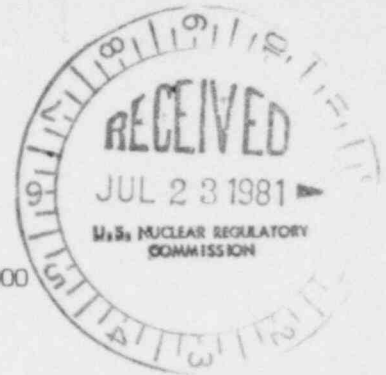




ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

July 20, 1981



2CAN078110

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Responses to NRC Questions on the
ANO-2, Cycle 2 Reload Report and the
Submittal of the CPC/CEAC Software
Verification Report
(File: 2-1510)

Gentlemen:

Enclosed as Attachment A are four (4) proprietary and five (5) non-proprietary copies of Amendment 2-P to a document entitled "Responses to Questions on Documents Supporting the ANO-2, Cycle 2, License Submittal", CEN-157(A)-P.

Enclosed as Attachment B are two (2) proprietary and six (6) non-proprietary copies of the "CPC/CEAC System Phase II Software Verification Test Report", CEN-162(A)-P.

Both of these documents are being submitted in support of the Unit 2, Cycle 2 reload effort. Advance information on this material has been provided to the NRC staff.

It is suggested that the appropriately designated portions of both of these documents be classified as proprietary information in accordance with the provisions of 10CFR2.790. The required affidavits from Combustion Engineering are attached.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

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ATTACHMENT A

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

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

I, P. L. McGill depose and say that I am the Vice President, Commercial 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 application of Arkansas Power and Light Co., for withholding this information.

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

Amendment 2-P to CEN-157(A)-P, Responses to Questions on Documents
Supporting the ANO-2, Cycle 2, License Submittal.

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 Combustion Engineering's thermal margin analysis methodology and associated protection system uncertainties, 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.

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 hundreds of manhours 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 related to the development of thermal margin analysis methodology and associated protection system uncertainties.

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.

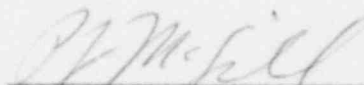
e. The information consists of thermal margin analysis methodology and associated protection system uncertainties, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion 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 system, 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.

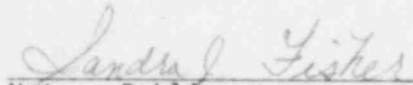
Further the deponent sayeth not.



P. L. McGill
Vice President
Commercial

Sworn to before me

this 17th day of July, 1981



Notary Public

My Commission Expires March 31, 1985