



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

September 11, 1981

2CAN098103

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
Core Protection Calculator
Addressable Constant
Determination Methodology
(File: 2-1510)

Gentlemen:

NRC letters dated April 10, 1981 and May 5, 1981 requested AP&L to provide a document which describes how the Core Protection Calculator (CPC) addressable constants are determined. Attached is Report MSS-NA2-P titled "Arkansas Nuclear One - Unit 2 Core Protection Calculator Addressable Constant Determination Methodology" for your review.

Parts of Report MSS-NA2-P are proprietary and are identified by vertical brackets. A proprietary affidavit is supplied with this letter pursuant to 10 CFR 2.790 since portions of the proprietary information have not been previously supplied to the NRC with affidavits.

A submittal of the non-proprietary version of the attached report will be made by September 30, 1981.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

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Attachment



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PDR ADOCK 05000368
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MEMBER MIDDLE SOUTH UTILITIES SYSTEM

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 Arkansas Power and Light Company, for withholding this information.

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

Arkansas Nuclear One-Unit 2 Core Protection Calculator Addressable
Constant Determination Methodology, MSS-NA2-P, August, 1981.

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 a description of the functional design and the quantitative data relating to addressable constants in the Combustion Engineering Core Protection Calculators, 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 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 analytical method and computer models.

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.

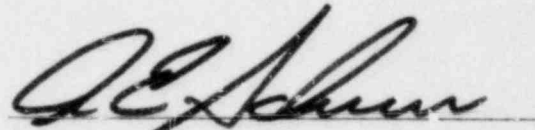
e. The information consists of descriptions of the functional design and quantitative data relating to addressable constants in the Core Protection Calculators, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to 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.

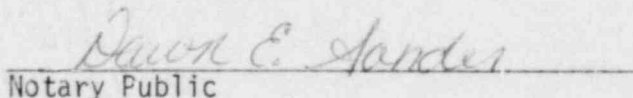
Further the deponent sayeth not.



A. E. Scherer
Director
Nuclear Licensing

Sworn to before me

this 11th day of September, 1981


Notary Public

DAWN E. SANDER, NOTARY PUBLIC
State of Connecticut No. 61536
Commission Expires March 31, 1986

PROPRIETARY INFORMATION

This document contains proprietary information and is not to be transmitted or reproduced without specific written approval from Arkansas Power & Light.

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PROPRIETARY INFORMATION