



GE Nuclear Energy

General Electric Company
1250 Century Avenue, San Jose, CA 95125

February 28, 1993

Docket No. 52-004
MFN No. 032-93

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington DC 20555

Attention: J.N. Wilson, Acting Director
Standardization Project Directorate

Subject: **Supplement to the Application for Design Certification of the
Simplified Boiling Water Reactor (SBWR), Proprietary
Information**

Reference: Supplement to the Application for Design Certification of the
Simplified Boiling Water Reactor (SBWR), Non-proprietary
Information, P.W. Marriott to J.N. Wilson, February 25, 1993,
Docket No. 52-004, MFN No. 031-93.

Dear Mr. Wilson:

Please find 52 copies of proprietary drawings for the SBWR SSAR (25A5113 Rev. A).
Each set includes one C-size (17 x 22 inch) binder, a paper wrapped package of engineering
drawings (also 17 x 22), and Appendix 18A. An appropriate affidavit is included.

Sincerely,

P.W. Marriott, Manager
Safety & Licensing
MC-444, (408)925-6948

*Add Info NP
SBWR processed
under Ltr No MFN 00091-93*

*Ltr Encl (1)
Change: NL 1 PWP
NRC FOR 1 PWP
1040
1/52 Sets Non Prop
Prop Drawings
(17 x 22)*

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General Electric Company

AFFIDAVIT

I, Patrick W. Marriott, being duly sworn, depose and state as follows:

1. I am Manager, Safety & Licensing, General Electric Company, 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 SBWR SSAR (25A5113 Rev. A), one C-size (17 x 22 inch) package, one C-size (17 x 22 inch) binder, and Appendix 18A.
3. In designating material as proprietary, General Electric utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.... A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information.... Some factors to be considered in determining whether given information is one's trade secret are: (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and to his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
 - a. Information that disclosed a process, method or apparatus 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 consisting of supporting data and analyses, including test data, relative to a process, method or apparatus, the application of which provide a competitive economic advantage, e.g., by optimization or improved marketability;
 - c. 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;
 - d. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of General Electric, its customers or suppliers;

- e. Information which reveals aspects of past, present or future General Electric customer-funded development plans and programs of potential commercial value to General Electric;
 - f. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
 - g. Information which General Electric must treat as proprietary according to agreements with other parties.
5. In addition to proprietary treatment given to material meeting the standards enumerated above, General Electric customarily maintains in confidence preliminary and draft material which has not been subject to complete proprietary, technical and editorial review. This practice is based on the fact that draft documents often do not appropriately reflect all aspects of a problem, may contain tentative conclusions and may contain errors that can be corrected during normal review and approval procedures. Also, until the final document is complete it may not be possible to make any definitive determination as to its proprietary nature. General Electric is not generally willing to release such a document in such a preliminary form. Such documents are, however, on occasion furnished to the NRC staff on a confidential basis because it is General Electric's belief that it is in the public interest for the staff to be promptly furnished with significant or potentially significant information. Furnishing the document on a confidential basis pending completion of General Electric's internal review permits early acquaintance of the staff with the information while protecting General Electric's potential proprietary position and permitting General Electric to insure the public documents are technically accurate and correct.
6. Initial approval of proprietary treatment of a document is typically made by the Subsection manager of the originating component, who is most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the Company is limited on a "need to know" basis and such documents are clearly identified as proprietary.
7. The procedure for approval of external release of such a document typically requires review by the Subsection Manager, Project manager, Principal Scientist or other equivalent authority, by the Subsection Manager of the cognizant Marketing function (or delegate) and by the Legal Operation for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside General Electric are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees then only with appropriate protection by applicable regulatory provisions or proprietary agreements.
8. The document mentioned in paragraph 2 above has been evaluated in accordance with the above criteria and procedures and has been found to contain information which is proprietary and which is customarily held in confidence by General Electric.
9. The information to the best of my knowledge and belief has consistently been held in confidence by the General Electric Company, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties have been made pursuant to regulatory provision - proprietary agreements which provide for maintenance of the information in confidence.

10. Public disclosure of the information, as called out in paragraph 2, sought to be withheld is likely to cause substantial harm to the competitive position of the General Electric Company and deprive or reduce the availability of profit making opportunities because it contains details of General Electric design which are not available to other parties without prior proprietary agreement. This information would provide other parties, including competitors, with valuable information associated with technical and business practices of the General Electric Company. This information is of a type customarily held in confidence by General Electric since it reveals valuable design information obtained at considerable expense to the General Electric Company.

STATE OF CALIFORNIA }
COUNTY OF SANTA CLARA } ss:

Patrick W. Marriott, 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 26 day of FEBRUARY 1993.



Patrick W. Marriott
General Electric Company

Subscribed and sworn before me this 26th day of February 1993.





Notary Public - California
Santa Clara County

**Instructions For Adding the February 28, 1993 SBWR SSAR Supplement
to the Previous Submittal (August 1992)**

Box Label	Contents	Instructions	Approx. # Sheets
Box 1 of 3 17 x 22 Binder Proprietary Drawings	New 17 x 22 Binder and proprietary drawings	New 17 x 22 Binder and proprietary drawings	265
Box 2 of 3 17 x 22 Drawing Inserts for Existing Binders Proprietary and Non-Proprietary	1 Paper-wrapped (17 x 22) set of proprietary drawings	Remove and discard all previous drawings in 17 x 22 binder labeled GE Proprietary Info. and replace with paper-wrapped packet	265
	1 Paper-wrapped (17 x 22) set of non-proprietary drawings	Insert or replace into existing (17 x 22) binder (Vol. 15) at the appropriate locations in numerical order. If figure number exists, replace with new figure.	109
Box 3 of 3 INSTRUCTIONS FOR ALL BOXES 2 Binders (8.5 x 11) SSAR 1 Binder (8.5 x 11) Tier 1 Document SSAR Inserts	3 New A size Binders titled: 1) Volume 3, Supplement containing Appendix 3E 2) Volume 7, Supplement containing Appendices 9A and 9B 3) Tier 1 Document - New Part of the Design Certification Application		300 250 300
	Multiple Shrink-wrapped packages - See subsequent sheets for a listing		1500

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Replacement Sections will have underline to annotate text additions, and ~~strikethrough~~ to annotate text deletions.

Section	Title	Replace Section	New Section	New Binder	New Tab
Chapter 1	Table of Contents	✓			
1.7	Engineering Drawings	✓			
1.8	Summary of SBWR Standard Plant COL Licensing Information		✓		
1.9	Conformance with SRP & Applicability of Codes & Standards		✓		
App. 1A	Response to TMI-Related Matters		✓		
App. 1B	Failure Modes and Effects Analysis		✓		
App. 1C	SBWR Compliance with EPRI URD		✓		
Chapter 3	Table of Contents	✓			
3.9	Mechanical Systems and Components	✓			
App. 3A	Seismic Soil-Structure Interaction Analysis		✓		
App. 3D	EQ Design Environmental Conditions	✓			
Appendix 3E	Table of Contents		✓	In Binder with 3E	
App. 3E	Eval. of Results of Seismic Category I Structures		✓	✓	
Chapter 6	Table of Contents	✓			
6.2	Safety Envelope Functional Design	✓			
6.3	Gravity-Driven Cooling System	✓			
6.6	Inservice Inspection of Class 2 & 3 Components		✓		
App. 6A	Containment Loads		✓		
Chapter 9	Table of Contents	✓			
9.4	Air Conditioning, Heating, Cooling, and Ventilation	✓			
Appendix 9A	Table of Contents		✓		
App. 9A	Fire Hazards Analysis		✓	✓	
App. 9B	Summary of Analysis Supporting Fire Protection Design Requirements		✓	In Binder with 9A	✓
Chapter 11	Table of Contents	✓			
11.2	Liquid Waste Management System	✓			
11.4	Solid Waste Management System	✓			
Chapter 12	Table of Contents	✓			
12.2	Plant Sources	✓			
12.3	Radiation Protection	✓			
Chapter 15	Table of Contents	✓			
15.6	Decrease in Reactor Coolant Inventory	✓			
Chapter 18	Table of Contents	✓			
App. 18A	Emergency Procedure Guidelines	✓			
App. 18F	Emergency Operation & Controls		✓		✓

Section	Title	Replace Section	New Section	New Binder	New Tab
Chapter 19	Table of Contents	✓			
19.1	Introduction	✓			
19.2	Plant Description, Assumptions & Methodology	✓			
19.3	Internal Event Accident Sequence Analysis	✓			
19.4	Containment Performance		✓		
19.5	External Events Analysis		✓		
19.6	Consequence Analysis		✓		
19.7	Sensitivity and Uncertainty Studies		✓		✓
19.8	Conclusions	✓			
App. 19A	Internal Events		✓		
Att. 19AA	Success Criteria	✓			
Att. 19AB	Dependant Failures	✓			
Att. 19AC	Human Reliability	✓			
Att. 19AD	Event Trees	✓			
Att. 19AE.1	Systems Analysis General Topics	✓			
Att. 19AE.2	Containment Isolation System	✓			
Att. 19AE.3	Primary Coolant Boundary Isolation	✓			
Att. 19AE.4	Isolation Condenser System	✓			
Att. 19AE.5	Control Rod Drive System	✓			
Att. 19AE.6	Standby Liquid Control System	✓			
Att. 19AE.7	Gravity Driven Cooling System	✓			
Att. 19AE.8	Automatic Depressurization System	✓			
Att. 19AE.9	FAPCS	✓			
Att. 19AE.10	RWCU/SDC	✓			
Att. 19AE.11	Misc. Air Systems	✓			
Att. 19AE.12	RCCWS	✓			
Att. 19AE.13	Plant Service Water System	✓			
Att. 19AE.14	Instrument, Logic & Control	✓			
Att. 19AE.15	8.9 kV ac & 480 Vac Power	✓			
Att. 19AE.16	DC Power Supply	✓			
Att. 19AE.17	Reactivity Control	✓			
Att. 19AE.18	Feedwater & Condensate System & Main Control	✓			
Att. 19AE.19	High Pressure Nitrogen System	✓			
Att. 19AF	Shutdown Risk Analysis		✓		

Section	Title	Replace Section	New Section	New Binder	New Tab
App. 19B	Containment Performance		✓		
Att. 19BA	Deterministic Model for DCH		✓		
Att. 19BB	Fuel Coolant Interaction		✓		
Att. 19BC	IC/PCC Tube Rupture		✓		
App. 19C	External Events		✓		
Att. 19CA	Screening		✓		
Att. 19CB	Fire		✓		
Att. 19CC	Flood		✓		
App. 19D	External Events (Seismic)		✓		
App. 19E	Consequence Analysis		✓		
App. 19F	Severe Accident Mitigation Design Alternatives		✓		✓
App. 19G	Response to CP/ML Rule		✓		
App. 19H	USI/GSI Applicability		✓		

SSAR Figure No.	Title
21.1.2-1	Site Plan
21.1.2-2 sh 1	Reactor Building, Section A-A 0/180 degrees
21.1.2-2 sh 2	Reactor Building, Section B-B 270/90 degrees
21.1.2-2 sh 3	Reactor Building, Floor Plan at El. 32100
21.1.2-2 sh 4	Reactor Building, Floor Plan at El. 25300
21.1.2-2 sh 5	Reactor Building, Plan at El. 22500
21.1.2-2 sh 6	Reactor Building, Plan at El. 19800/20550
21.1.2-2 sh 7	Reactor Building, Plan at El. 18500
21.1.2-2 sh 8	Reactor Building, Floor Plan at El. 17200
21.1.2-2 sh 9	Reactor Building, Plan at El. 16000
21.1.2-2 sh 10	Reactor Building, Plan at El. 15500
21.1.2-2 sh 11	Reactor Building, Floor Plan at El. 13200
21.1.2-2 sh 12	Reactor Building, Plan at El. 12500
21.1.2-2 sh 13	Reactor Building, Ground Grade Plan at El. 10000
21.1.2-2 sh 14	Reactor Building, Plan at El. 9000
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21.1.2-2 sh 20	Reactor Building, Floor Plan at El. -6400
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21.1.2-3 sh 2	Turbine Building, Intermediate Floor Plan at El. 17320
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21.3.8-4	RB Partial Floor Plan Elevation -2800
21.3.8-5	RB & RCCV Basemat Sections & Details
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SSAR Figure No.	Title
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SSAR Figure No.	Title
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SSAR Figure No.	Title
21.9A-20	Fire Protection System Reactor Building Barrier Drawing
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21.10.2-1	Hydrogen & Carbon Dioxide Bulk Storage System P&ID
21.10.3-1	Main Steam System P&ID
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21.10.4-3	Main Condenser Evacuation System P&ID
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21.11.2-2 sh 4	Detergent Drain P&ID
21.11.2-3 sh 1	Equipment Drain Oil Separator P&ID
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21.11.2-3 sh 3	Equipment Drain Precoat Filter P&ID
21.11.2-3 sh 4	UV/Ozone Treatment P&ID
21.11.2-3 sh 5	Equipment Drain Demineralizers P&ID
21.11.2-3 sh 6	Equipment Drain Sample Tanks P&ID
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21.11.2-3 sh 13	Floor Drain Demineralizers P&ID
21.11.2-3 sh 14	Floor Drain Sample Tanks P&ID
21.11.2-3 sh 15	Chemical Drain P&ID
21.11.2-3 sh 16	Chemical Drains P&ID
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SSAR Figure No.	Title
21.11.3-1 sh 1-2	Offgas System PFD
21.11.3-2 sh 1-2	Offgas System P&ID
21.11.3-3 sh 1-3	Offgas System LD *
21.11.4-1	Solid Waste Management System BFD
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21.11.4-2 sh 2	Wet Solid Waste Processing PFD
21.11.4-2 sh 3	Dry Solid Waste PFD
21.11.4-3 sh 1	Spent Resin P&ID
21.11.4-3 sh 2	Phase Separator P&ID
21.11.4-3 sh 3	Dewatering P&ID
21.11.4-3 sh 4	Solid Mobile System Interface P&ID
21.12.3-1 sh 1	Reactor Building Radiation Zone Full Power/Shutdown, Section A-A
21.12.3-1 sh 2	Reactor Building Radiation Zone Full Power/Shutdown at El. 32100
21.12.3-1 sh 3	Reactor Building Radiation Zone Full Power/Shutdown at El. 25300
21.12.3-1 sh 4	Reactor Building Radiation Zone Full Power/Shutdown at El. 22500
21.12.3-1 sh 5	Reactor Building Radiation Zone Full Power/Shutdown at El. 17200
21.12.3-1 sh 6	Reactor Building Radiation Zone Full Power/Shutdown at El. 16000
21.12.3-1 sh 7	Reactor Building Radiation Zone Full Power/Shutdown at El. 13200
21.12.3-1 sh 8	Reactor Building Radiation Zone Full Power/Shutdown at El. 10000
21.12.3-1 sh 9	Reactor Building Radiation Zone Full Power/Shutdown at El. 6600
21.12.3-1 sh 10	Reactor Building Radiation Zone Full Power/Shutdown at El. 3050

21.12.3-1 sh 13	Reactor Building Radiation Zone Full Power/Shutdown at El. -6400
21.12.3-2 sh 1	Reactor Building Post LOCA Radiation Zone, Section A-A
21.12.3-2 sh 2	Reactor Building Post LOCA Radiation Zone at El. 32100
21.12.3-2 sh 3	Reactor Building Post LOCA Radiation Zone at El. 25300
21.12.3-2 sh 4	Reactor Building Post LOCA Radiation Zone at El. 22500
21.12.3-2 sh 5	Reactor Building Post LOCA Radiation Zone at El. 17200
21.12.3-2 sh 6	Reactor Building Post LOCA Radiation Zone at El. 16000
21.12.3-2 sh 7	Reactor Building Post LOCA Radiation Zone at El. 13200
21.12.3-2 sh 8	Reactor Building Post LOCA Radiation Zone at El. 10000
21.12.3-2 sh 9	Reactor Building Post LOCA Radiation Zone at El. 6600
21.12.3-2 sh 10	Reactor Building Post LOCA Radiation Zone at El. 3050
21.12.3-2 sh 11	Reactor Building Post LOCA Radiation Zone at El. -1000
21.12.3-2 sh 12	Reactor Building Post LOCA Radiation Zone at El. -2000
21.12.3-2 sh 13	Reactor Building Post LOCA Radiation Zone at El. -6400
21.12.3-3 sh 1	Turbine Building Radiation Zone Full Power/Shutdown, Base slab
21.12.3-3 sh 2	Turbine Building Radiation Zone Full Power/Shutdown, El. 17920
21.12.3-3 sh 3	Turbine Building Radiation Zone Full Power/Shutdown, El. 21580
21.12.3-3 sh 4	Turbine Building Radiation Zone Full Power/Shutdown, El. 31940
21.12.3-3 sh 5	Turbine Building Radiation Zone Full Power/Shutdown, Section B-B

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SSAR Figure No.	Title
21.12.3-4	Radwaste Building Radiation Zone
21.18D-1	Arrangement of Equipment on Main Control Console
21.18D-2 sh 1-2	Fixed-Position Displays
21.18E-1 sh 1-3	SBWR Man-Machine Interface Systems Design & Implementation Process *

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