



HELPING BUILD ARKANSAS

ARKANSAS POWER & LIGHT COMPANY

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February 28, 1979

DONALD A. RUETER
DIRECTOR
TECHNICAL AND
ENVIRONMENTAL SERVICES

2-029-23

Director of Nuclear Reactor Regulation
ATTN: John F. Stolz, Chief
Branch No. 1
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Arkansas Nuclear One-Unit 2
Docket No. 50-368
License No. NPF-6
Plant Protection System
Setpoint Report
(File: 2-1510)

Gentlemen:

This letter provides the information requested in your letter dated March 22, 1977, and in Amendment No. 1 to License No. NPF-6 dated September 1, 1978, and also describes the setpoint methodology used to determine setpoints for Arkansas Nuclear One-Unit 2.

Please note that the values for low pressurizer pressure, low steam generator pressure and low steam generator water level are consistent with our January 9, 1979 submittal to you.

The high pressurizer pressure reactor trip setpoint shows an increase of 23 psi above that presently shown in the Technical Specifications. The increase is due to the elimination of the dynamic allowance. Test data has shown the instrument channel response time to be less than that assumed in the Safety Analysis, therefore, the dynamic allowance factor is no longer required and has been removed. A revision to the Technical Specifications will be forthcoming from us.

Attached are eight proprietary copies (copy numbers 1-8) and twenty non-proprietary copies of our report entitled "Determination of Plant Protection System Trip Setpoint Values."

Certain information contained in the attachments is proprietary to Arkansas Power and Light Company. Pursuant to 10 CFR 2.790, it is requested that this information be withheld from public disclosure.

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TAX PAYING, INVESTOR OWNED



MEMBER MIDDLE SOUTH UTILITIES SYSTEM


February 28, 1979

Also in accordance with 10 CFR 2.790(b) it is recognized that withholding this information from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the information. The non-proprietary versions of all attached pro-proprietary documents are attached. In addition, the affidavit specified by 10 CFR 2.790(b) is attached. This information has been characterized as proprietary for one or more of the reasons specified in the attached affidavit.

The pages containing proprietary information have been so indicated.

Please contact us if you have any questions regarding the proprietary nature of this material.

Very truly yours,



Donald A. Rueter

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Attachments

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Arkansas Power and Light Company)
State of Arkansas)
County of Pulaski) SS.:

I, D. A. Rueter, depose and say I am the Director, Technical and Environmental Services, of Arkansas Power and Light Company, 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 provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is, Arkansas Power & Light Company, Arkansas Nuclear One-Unit 2, "Determination of Plant Protection System Trip Setpoint Values."

I have personal knowledge of the criteria and procedures utilized by Arkansas Power and Light Company 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 documents, should be withheld.

1. The information sought to be withheld from public disclosure is the method of determining protection system instrument setpoints, which is owned by our NSSS supplier and used and held in confidence by Arkansas Power & Light Company and our NSSS supplier.

2. The information consists of test data or other similar data concerning a process, method or component, the application of which would result in a substantial commercial advantage to a competitor or other customer of our NSSS vendor.

3. The information is of a type customarily held in confidence by Arkansas Power & Light Company and not customarily disclosed to the public. Arkansas Power & Light Company has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilized a procedure to determine when and whether to hold certain types of information in confidence. This procedure 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 commercial position of Arkansas Power & Light Company or competitive position of our NSSS supplier because:

a. A similar product is bought and/or utilized by major electric utilities with nuclear facilities.

b. Development of this information required thousands of man-hours of effort and hundreds of thousands of dollars. To the best of my knowledge and belief a competitor of our NSSS supplier would have to undergo similar expense in generating equivalent information.

c. In order to acquire such information, a competitor of our NSSS supplier would also require considerable time and inconvenience related to developing an equivalent setpoint methodology and obtaining the data on instrument 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 NSSS supplier competitor's cost in applying the information and marketing the product to which the information is applicable.

e. The information consists of specific instrument uncertainty data and the methodology for accommodating instrument uncertainties via a setpoint calculation, the application of which would provide a competitor of our NSSS supplier with an economic advantage. The availability of such information would enable competitors of our NSSS supplier to modify their product, take marketing or other actions to improve their product's position or impair the position of this product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

f. In pricing these products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of our NSSS supplier's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

Further the deponent sayeth not.

Donald A. Rueter
D. A. Rueter

Director, Technical and
Environmental Services

Sworn to before me

this 28TH day of February 1979

Robert E. Baker

Notary Public

My Commission Expires: February 17, 1982