

Docket No.: STN-50-470F

May 14, 1982
LD-82-054

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: CESSAR SER Confirmatory Item on Statistical Combination of
Uncertainties

References: (A) Letter A. E. Scherer to D. G. Eisenhut, dated February 9,
1982

(B) "Statistical Combination of Uncertainties: Combination of
System Parameter Uncertainties in Thermal Margin Analysis for
Arkansas Nuclear One Unit 2," CEN-139(A)-P, November, 1980

Dear Mr. Eisenhut:

Transmitted herewith are 40 proprietary and 40 non-proprietary copies of the report on the statistical combination of system parameter uncertainties for the System 80 plants. An additional report on the statistical combination of state parameter uncertainties will be provided in July, 1982. These reports are intended to complete the C-E input that the Staff needs to close out the CESSAR confirmatory item concerning Statistical Combination of Uncertainties (SCU).

Reference (A) contained the initial C-E response to the Staff on the utilization of SCU for System 80. It was stated therein that the SCU methods to be used for System 80, with the exception of flow model uncertainties, would be similar to those employed in Reference (B). The Staff has stated that a similar report to Reference (B) with additional discussion of the statistical combination of state parameter uncertainties, prepared specifically for the System 80 design, was required to complete their review. The enclosed report and the July submittal will provide the requested information.

This report is applicable to the System 80 standard design. The quantitative information provided will be verified to bound data which will be generated for each System 80 plant.

Due to the proprietary nature of the material contained in the enclosures, we request that it be withheld from public disclosure in accordance with the provisions of 10CFR 2.790 and that this information be safeguarded. The reasons for the proprietary classification of this report are delineated in the enclosed affidavit.

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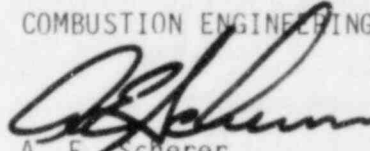
Mr. Darrell G. Eisenhut
May 11, 1982

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If I can be of any additional assistance in this matter, please contact me or Mr. G. A. Davis of my staff at (203)688-1911, Extension 2803.

Very truly yours,

COMBUSTION ENGINEERING, INC.

A handwritten signature in dark ink, appearing to read 'A. E. Scherer', is written over the company name.

A. E. Scherer
Director
Nuclear Licensing

AES:ctk

Enclosures

cc: C. I. Grimes

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 authorize' 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 Omaha Public Power District, for withholding this information.

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

Statistical Combination of Uncertainties (Combination of System Parameter Uncertainties in Thermal Margin Analyses for System 80 plants)

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 the thermal hydraulic methods, fuel fabrication data, thermal hydraulic input and performance data 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 thermal hydraulic data and methods and fuel fabrication data.

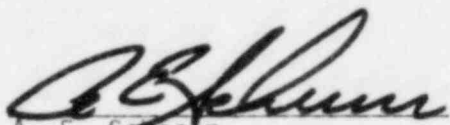
d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

e. The information consists of thermal hydraulic input and performance data and methods and fuel fabrication information 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.

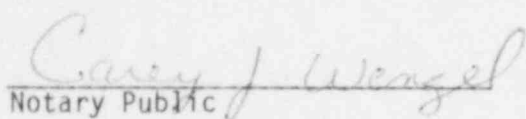
g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.


A. E. Scherer
Director, Nuclear Licensing

Sworn to before me

this 10th day of May, 1983


Notary Public

CAREY J. WENZEL, NOTARY PUBLIC
State of Connecticut No. 59962
Commission Expires March 31, 1985