



Docket: STN 50-470F

August 19, 1983
LD-83-076

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

Subject: CESSAR-SER Confirmatory Item 7, Statistical Combination of
Uncertainties

Reference: Letter LD-83-010, A. E. Scherer to D. G. Eisenhut, dated February
28, 1983

Dear Mr. Eisenhut:

Transmitted herewith are twenty-five (25) proprietary and fifteen (15) non-proprietary copies of "Enclosure 2-P to LD-83-010 Revision 01, Statistical Combination of Uncertainties, Part III" and "Enclosure 2-NP to LD-83-010 Revision 01, Statistical Combination of Uncertainties, Part III".

The initial issue of this report was submitted via the Reference and was intended to complete our documentation on CESSAR SER Confirmatory Item No. 7, Statistical Combination of Uncertainties (SCU). Combustion Engineering has, however, discovered a minor non-conservative error in one of the component uncertainties used in the CESSAR-F SCU analysis. This error has a small but recordable impact on the overall uncertainty factor obtained by the SCU analysis. The resulting increase in overall uncertainty will be implemented into the data base for the Core Operating Limit Supervisory System of plants referencing the CESSAR-F SCU analysis.

Revision 01 to Part III of the CESSAR-F SCU report is identical to the version provided in the Reference except for small changes to the final uncertainty and some intermediate uncertainty values. All sections of the report which have been changed are identified by vertical bars in the margin. The revised report supersedes the version provided by the Reference in its entirety. We therefore request that the reports entitled "Enclosure 2-P to LD-83-010" and "Enclosure 2-NP to LD-83-010" be returned to us. Part II, also submitted via the Reference, is not affected by the change described herein.

E003
1/25-Prop
15-Non Prop

Change: PDR
NSIC } Non-Prop
NTIS }

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PDR ADDCK 05000470
E PDR

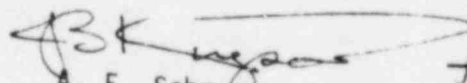
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Due to the proprietary nature of the material contained in the enclosure, we request that it be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and that this material be safeguarded. The reasons for the proprietary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

Very truly yours,

COMBUSTION ENGINEERING, INC.

 for AES
A. E. Scherer
Director
Nuclear Licensing

AES:las

Enclosures:

Enclosure 2-P to LD-83-010, Revision 01, "Statistical Combination of Uncertainties, Part III", Proprietary Version (copies 0001 - 0025)

Enclosure 2-NP to LD-83-010, Revision 01, "Statistical Combination of Uncertainties, Part III", Non-Proprietary Version (15 copies)

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.
State of Connecticut
County of Hartford

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)
) 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 for withholding this information.

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

Enclosure 2P to LD-83-010, Revision 01, Statistical Combination of Uncertainties, Part III.

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 is the application of statistical methods in combining measurement uncertainties associated with the Limiting Conditions for Operation of System 80 Nuclear Steam Supply Systems, 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 document 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 reactor 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 applying the method of statistical combination to the overall uncertainty analysis for operation of a Nuclear Steam Supply System.
- 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 the unique use of statistical methods in the overall uncertainty analysis for operation of nuclear reactors, 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.

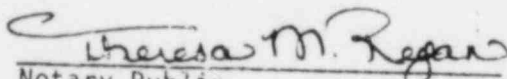
g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential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

Further the deponent sayeth not.


P. L. McGill
Vice President
Commercial

Sworn to before me

this 19th day of August, 1983


Notary Public

THERESA M. REGAN, NOTARY PUBLIC
STATE OF CONNECTICUT NO. 68097
COMMISSION EXPIRES MARCH 31, 1988