

LOUISIANA
POWER & LIGHT

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February 22, 1984

W3P84-0446
3-A1.01.04

Director of Nuclear Reactor Regulation
Attention: Mr. G.W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Waterford SES Unit 3
Docket No. 50-382
Request for Additional Information on
Waterford 3 - Core Bypass Flow

Dear Sir:

Your letter of February 1, 1984 requested that information be provided relative to the Core Bypass Flow specified in Sections 4.4.1.4 and 4.4.2.6.1 of the Waterford 3 FSAR. Specifically the following was requested:

- a) Justify the Waterford - 3 design value of 2.6% for the bypass flow and the value of 2.1% for the calculated bypass flow, and
- b) Provide a description of the guide tube designs before and after the reduction in bypass flow and calculations justifying the reduction in bypass flow.

In response attached please find proprietary copies 000008 through 000010 of Combustion Engineering, Inc. report CEN-275(C)-P. Also enclosed is a copy of the non-proprietary version.

Pursuant to Section 2.790, 10 CFR Part 2, it is requested that the proprietary version of the report be withheld from public disclosure. Should you have any questions concerning the proprietary nature of the report transmitted herewith, please address these questions directly to:

8402240062 840222
PDR ADOCK 05000382
A PDR

3001
1/1NP
3Prop

Change: BNL
DMB/DSS
FEMA
LPDR
PDR
NSIC
NTIS


Non Prop Only

Mr. A.E. Scherer
Director of Licensing (9438-1922)
Combustion Engineering, Inc.
1000 Prospect Hill Road
Windsor, CT 06095

It is also requested that you provide a copy of any questions concerning the proprietary nature of this submittal to LP&L.

Should you have any questions or wish to discuss this matter further, please do not hesitate to contact me.

Very truly yours,



K.W. Cook
Nuclear Support & Licensing Manager

cc: E.L. Blake, W.M. Stevenson, J.H. Wilson, G.L. Constable

bcc: R.S. Leddick, R.M. Nelson, R.A. Savoie, M.J. Meisner,
K.R. Iyengar, W. Wittich, W. Cross, G. Hofer (EBASCO),
Central Records, Nuclear Records, Licensing Library

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 Louisiana Power and Light Company for withholding this information.

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

CEN-275(C)-P, Response to NRC Question on Waterford-3 Bypass Flowrate,
January 16, 1984

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 detailed descriptions of the reactor core internals design, detailed hydraulic resistances and associated bypass leakage flowrates, which are owned and have 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 hundreds of man-hours and tens 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 a fuel design with performance characteristics similar to that of Combustion Engineering, Inc.

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 detailed descriptions of the reactor core internals design, detailed hydraulic resistances and associated bypass leakage flowrates, 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.

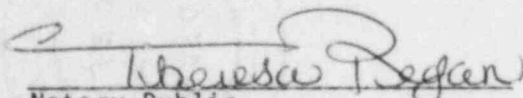
Further the deponent sayeth not.



A. E. Scherer
Director
Nuclear Licensing

Sworn to before me

this 20th day of February, 1984



Notary Public

THERESA M. REGAN, NOTARY PUBLIC
STATE OF CONNECTICUT NO. 66397
COMMISSION EXPIRES MARCH 31, 1988