



Carolina Power & Light Company

SERIAL: LAP-83-576

JAN 03 1984

Director of Nuclear Reactor Regulation
Attention: Mr. D. B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing
United States Nuclear Regulatory Commission
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DFR-62
RELOAD ANALYSIS
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Vassallo:

REFERENCES

1. Carolina Power & Light Company letter from Mr. S. R. Zimmerman to Mr. D. B. Vassallo (NRC) dated March 10, 1983.
2. U.S. NRC letter from Mr. D. B. Vassallo to Mr. E. E. Utley (CP&L) dated November 1, 1983 (Docket Nos. 50-325, 324).

SUMMARY

The purpose of this letter is to transmit the additional information that was requested by the NRC Staff in Reference 2. The enclosed transmittal is an amendment to the licensing topical reports that describe Carolina Power & Light Company's (CP&L) boiling water reactor (BWR) steady-state analysis methods for the Brunswick Steam Electric Plant. The aforementioned reports were previously submitted to the NRC Staff for review (Reference 1).

DISCUSSION

The documents enclosed provide additional information that has been requested by the Staff to facilitate the review of the CP&L BWR reload analysis methods. The following documents are enclosed:

1. "A Description and Validation of Steady-State Analysis Methods for Boiling Water Reactor," CP&L NF-1583.01-1, Amendment 1. [(Enclosure 1 - 40 copies)].

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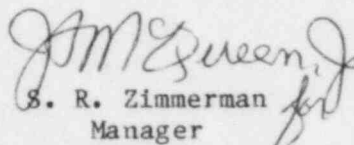
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2. "Methods of RECORD, An LWR Fuel Assembly Burnup Code," CP&L NF-1583.02-1, Amendment 1. [Enclosure 2 (40 copies - proprietary version) and Enclosure 3 (40 copies - non-proprietary version)].
3. "Methods of PRESTO-B, A Three-Dimensional BWR Core Simulator Code," CP&L NF-1583.03-1, Amendment 1. [Enclosure 4 (40 copies - proprietary version) and Enclosure 5 (40 copies - non proprietary version)].

An affidavit describing the proprietary basis for Enclosure 2 is provided in Enclosure 6, and an affidavit describing the proprietary basis for Enclosure 4 is provided in Enclosure 7.

If you have any questions concerning this submittal, please contact our staff.

Yours very truly,


S. R. Zimmerman
Manager

Nuclear Licensing Section

WRM/kjr (9097WRM)
Enclosures

cc: Mr. Carl Berlinger (NRC) (w/o attachments)
Mr. Dan Fieno (NRC) (w/attachments)
Mr. Wayne Hodges (NRC) (w/o attachments)
Mr. M. Grotenhuis (NRC)
Mr. S. D. MacKay (NRC) (w/o attachments)
Mr. D. O. Myers (NRC-BSEP) (w/o attachments)
Mr. J. P. O'Reilly (NRC-RII)
Mr. Larry Philips (NRC) (w/o attachments)

AFFIDAVIT PURSUANT
TO TITLE 10 CFR 2.790

Submission of Proprietary Commercial Data

Scandpower Inc.)
State of Maryland)
County of Montgomery) SS.:

I, D. L. Pomeroy, depose and say that I am the Secretary Treasurer of Scandpower 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:

Methods of RECORD - An LWR Fuel Assembly Burnup Code CP&L NF-1583.02-1, Amendment 1.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Scandpower 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 owned and has been held in confidence by Scandpower.

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 Scandpower.

3. The information is of a type customarily held in confidence by Scandpower and not customarily disclosed to the public. Scandpower 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 criteria generally applied in deleting proprietary information are listed in Table 1. 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.

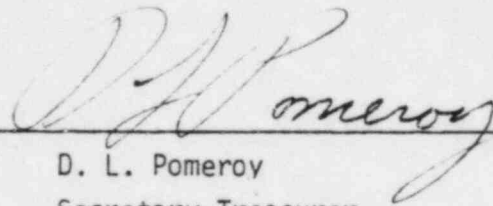
6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Scandpower because:

- a. A similar computer code is being developed and sold by competitors of Scandpower.
- b. Development of this information by ScP required thousands of man-hours 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 obtaining measurements, providing comparable calculational tools, and conducting the predictive comparisons.
- d. The information required significant effort and expense to obtain the 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 results of critical experiments and comparisons of predictions to the measured values, 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 Scandpower, take marketing or other actions to improve their product's position or impair the position of Scandpower's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- f. In pricing Scandpower's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of Scandpower's competitors to utilize such information without similar expenditure of resources may

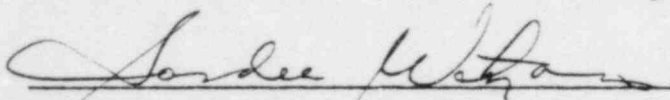
enable them to sell at prices reflecting significantly lower costs.

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

Further the deponent sayeth not.


D. L. Pomeroy
Secretary Treasurer

Sworn to before me *Montgomery County, Md.*
this *16th* day of *December 1983*


Notary Public
com. exp 7/1/86

CRITERIA FOR PROPRIETARY INFORMATION

Code numbers 1-6 have been used in the right hand margin of the text in deleting proprietary information. The following list explains the criteria associated with these code numbers.

<u>Code No.</u>	<u>Criteria</u>
1	Information reveals confidential cost or price information, commercial strategies, production production capabilities, or budget levels of Scandpower, its customers or suppliers.
2	The information reveals <u>data or material</u> concerning Scandpower or customer funded <u>research or development plans or programs of substantial present or potential competitive advantage to Scandpower.</u>
3	The use of the information by a competitor would substantially decrease his expenditures, in <u>time or resources</u> , in designing, producing or marketing a similar product.
4	The information <u>consists of test data or other similar data concerning a process, method or component</u> , the application of which results in a substantial competitive advantage to Scandpower.
5	The information reveals <u>special aspects of a process, method, component or the like, the exclusive use of which results in a substantial competitive advantage to Scandpower.</u>
6.	The information contains ideas for which <u>patent protection is likely to be sought.</u>

NF-1583.02 Amendment 1 (RECORD)

<u>Reference to Proprietary Information</u>	<u>Reason Code Number</u>
Table 5.1	2,3
Response to Question 21 (part)	2,3
Appendix A, Table A-1	2,3

ENCLOSURE 7 TO LAP-83-576

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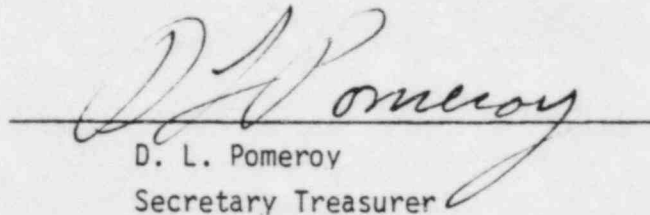
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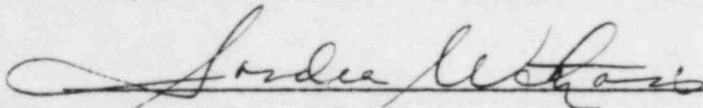
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6.	The information <u>contains ideas for which patent protection is likely to be sought</u> .

NF-1583.03 Amendment 1 (PRESTO)

<u>Reference to Proprietary Information</u>	<u>Reason Code Number</u>
Response to Question 3, (part)	2,3
Response to Question 4, (part)	2,3
Response to Question 5, (part)	2,3
Response to Question 6, (part)	2,3
Response to Question 8, (part)	2,3
Response to Question 9, (part)	2,3
Figure 9.1	2,3
Response to Question 12, (part)	2,3