Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

March 8, 1996

ComEd

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Application of Siemen's Power Corporation ANFB Critical Power Correlation to Coresident General Electric Fuel for LaSalle Unit 2 Cycle 8

References:
1. September 15, 1994 Conference Call between ComEd (G. Benes, J. Silady, et al.), NRR (R. Pulsifer, L. Phillips, et al.), and SPC (R. Copeland, et al.)

2. "Submittal of EMF-1125(P), Supplement 1 Appendix C", R. A. Copeland(SPC) to Director of Nuclear Reactor Regulation, dated November 30,1995, RAC:95:156

On January 31, 1996, a meeting was held between representatives of the NRC, Commonwealth Edison Company (ComEd), and Siemens Power Corporation - Nuclear Division (SPC) to discuss the application of the ANFB critical power correlation to coresident General Electric fuel in SPC transition cores. Previously, in September of 1994, ComEd and SPC provided an overview of this to your Staff on a conference call (Reference 1). During the recent meeting, the NRC indicated that generic approval for the proposed application process (Reference 2) could not be provided in time to support LaSalle Unit 2 Cycle 8. Therefore, the NRC requested that a cycle specific report be submitted to justify application of the ANFB critical power correlation to coresident GE fuel present in LaSalle Unit 2 Cycle 8. Included with this letter are proprietary and non proprietary versions of the cycle specific report, Application of the ANFB Critical Power Correlation to Coresident GE Fuel for LaSalle Unit 2 Cycle 8, EMF-96-021 (P), Revision 1, February 1996. In accordance with the requirements of 10CFR 2.790(b), an affidavit for this document is enclosed to support the withholding of this report from public disclosure.

The startup date for LaSalle Unit 2 Cycle 8 is currently scheduled as November 21, 1996. Licensing analyses for Cycle 8 are in progress using the methods described in the above report. ComEd therefore requests that the NRC review and approval be completed as early as possible but no later than one month prior to the startup of Cycle 8. In the near future, ComEd will also be submitting Technical Specification changes required for the startup of Unit 2 Cycle 8 that will primarily reflect revisions associated with the change from GE NRC approved methodology to SPC NRC approved methodology.

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If there are any further questions, please contact this office.

Sincerely,

Gary G. Benes
Nuclear Licensing Administrator

Attachments:

1. Proprietary version of the cycle specific report: Application of the ANFB Critical Power Correlation to Coresident GE Fuel for LaSalle Unit 2 Cycle 8, EMF-96-021 (P), Revision 1, February 1996.

2. Non-proprietary version of the cycle specific report: Application of the ANFB Critical Power Correlation to Coresident GE Fuel for LaSalle Unit 2 Cycle 8, EMF-96-021 (NP), Revision 1, February 1996.

3. Withholding affidavit for Proprietary version of the cycle specific report: Application of the ANFB Critical Power Correlation to Coresident GE Fuel for LaSalle Unit 2 Cycle 8, EMF-96-021 (P), Revision 1, February 1996.

cc: H. J. Miller, Regional Administrator - RIII
M. D. Lynch, Project Manager - NRR
P. G. Brochman, Senior Resident Inspector - LaSalle
Office of Nuclear Facility Safety - IDNS

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AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, R. A. Copeland being duly sworn, hereby say and depose:

1. I am Manager, Product Licensing, for Siemens Power Corporation ("SPC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with SPC's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the topical report EMF-96-021(P) entitled "Application of the ANFB Critical Power Correlation to Coresident GE Fuel for LaSalle Unit 2 Cycle 8," referred to as "Document." Information contained in this Document has been classified by SPC as proprietary in accordance with the control system and policies established by SPC for the control and protection of information.

4. The Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by SPC and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as proprietary and confidential.

5. The Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document will not be disclosed or divulged.

6. The Document contains information which is vital to a competitive advantage of SPC and would be helpful to competitors of SPC when competing with SPC.

7. The information contained in the Document is considered to be proprietary by SPC because it reveals certain distinguishing aspects of SPC licensing methodology which secure competitive advantage to SPC for fuel design optimization and marketability, and includes information utilized by SPC in its business which affords SPC an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

8. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it valuable insights into SPC licensing methodology and would result in substantial harm to the competitive position of SPC.

9. The Document contains proprietary information which is held in confidence by SPC and is not available in public sources.

10. In accordance with SPC's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside SPC only as required and under suitable agreement providing for nondisclosure and limited use of the information.

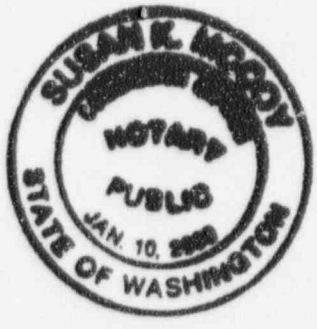
11. SPC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

12. Information in this Document provides insight into SPC licensing methodology developed by SPC. SPC has invested significant resources in developing the methodology as well as the strategy for this application. Assuming a competitor had available the same background data and incentives as SPC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as SPC.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.

SUBSCRIBED before me this 23rd day of February, 1996.



Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/10/00