

SIEMENS

September 20, 1996

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Document Control Desk

U.S. Nuclear Regulatory Commission

ATTN: Chief, Planning, Program and Management Support Branch

Washington, D.C. 20555-0001

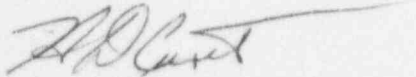
**Request for Review of RODEX2A (BWR) Fuel Rod Thermal-Mechanical Evaluation Model:
Validation, EMF-85-74(P), Revision 0, Supplement 1**

Enclosed are fifteen (15) copies of the proprietary and twelve (12) copies of the non-proprietary version of RODEX2A (BWR) Fuel Rod Thermal-Mechanical Evaluation Model: Validation, EMF-85-74(P), Revision 0, Supplement 1, for review by the NRC. The purpose of this review is to get approval from the NRC which will make the burnup limitations for the RODEX2A and RODEX2 evaluation models consistent. The only difference between RODEX2A and RODEX is in the fission release model.

Some of the information contained in the enclosed topical reports is considered to be proprietary to Siemens Power Corporation. As required by 10 CFR 2.1790(b), an affidavit is attached to support the withholding of this information from public disclosure.

If you have any questions or if I can be of further assistance, please call me at (509) 375-8563.

Very truly yours,



H. D. Curet, Manager
Product Licensing

/smg

Enclosures

cc: (w/o Enclosures)

Mr. T. E. Collins (USNRC)

Mr. L. E. Phillips (USNRC)

Mr. E. Y. Wang (USNRC)

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*Two RIDS
T007 - 1/15 Prop
T008 - 1/12 Non Prop*

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AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, H. D. Curet, 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 information transmitted by the letter from H. D. Curet (SPC) to Chief, Planning, Program and Management Support (USNRC) dated September 20, 1996 with the subject "Request for Review of RODEX2A (BWR) Fuel Rod Thermal-Mechanical Evaluation Model: Validation, EMF-85-74(P), Revision 0, Supplement 1," 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.

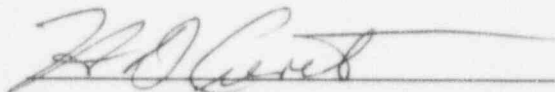
10. In accordance with SPC's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside SPC only as required and under suitable agreement providing for nondisclosure and limited use of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

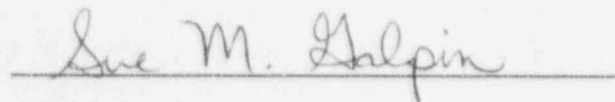
12. Information in this Document provides insight into SPC licensing methodology developed by SPC. SPC has invested significant resources in developing the methodology as well as the strategy for this application. Assuming a competitor had available the same background data and incentives as SPC, the 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 20th
day of September, 1996.



Sue M. Galpin
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 02/27/00

