Westinghouse Electric Corporation Energy Systems

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NSD-NRC-97-5071
DCP/NRC0816
Docket No.: STN-52-003

April 15, 1997

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: T. R. QUAY

SUBJECT: RESPONSE TO NRC REQUEST TO RELEASE G-1 AND G-2 BLOWDOWN TEST DATA FOR USE IN TRAC CODE VALIDATION

References:
1. Letter, W. C. Huffman (USNRC) to N. J. Liparulo (W), "Request for Westinghouse Test Data to Support the Nuclear Regulatory Commission (NRC) Computer Code Benchmarking for AP600 Analyses", February 26, 1997.

2. "Compendium of ECCS Research for Realistic LOCA Analysis," NUREG-1230, December, 1988.

Dear Mr. Quay:

In Reference 1, the NRC requested Westinghouse to provide proprietary G-1 and G-2 blowdown test data to the NRC for use in validation of the TRAC code, which will be used for the NRC confirmatory calculations for AP600 Large Break LOCA.

Westinghouse understands that the NRC is in the process of improving the TRAC code's accuracy and capabilities, and that the resulting code will be publicly available to our domestic and international competitors.

The G-1 and G-2 blowdown test data is information of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse 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 application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

The use of this test data by Westinghouse gives Westinghouse a competitive advantage over its competitors. To release these data would permit our competitors to obtain access to improved blowdown cooling heat transfer models which accurately reflect the observed behavior during the blowdown phase of a large break LOCA in a pressurized water reactor at our expense. To design and

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construct a comparable facility, and perform a similar test program, would require an investment of at least $10M today. It has been, therefore, withheld from disclosure to protect the Westinghouse competitive position.

Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage. Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.

Westinghouse, therefore, does not approve the release of these test data for the requested purpose.

Westinghouse has not taken this request lightly, and offers the following alternate suggestion. The publicly available blowdown cooling heat transfer data obtained in the Semiscale integral effects test facility could be used to assess the TRAC models. Our review of Reference 2, Appendix A indicates that the S-07 and S-UHD test series performed with the Semiscale Mod-3 configuration should have provided rod bundle data for the conditions of interest (high pressure film boiling in downflow). The S-UHD series examined large break LOCA phenomena with the upper head injection configuration. The upper head injection configuration gives high flow rates through the core during blowdown, so that this test series should also have exhibited top down quenching.

If you have any questions regarding this position, please contact Mitchell Nissley at (412) 374-4303.

Brian A McIntyre, Manager
Advanced Plant Safety and Licensing

jml

cc: M. W. Hodges - NRC/RES
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