

December 27, 1999

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
TRANSMITTAL OF CALCULATION NOTEBOOKS SUPPORTING DEVELOPMENT
OF RELAP DECK FOR REEVALUATING PRESSURIZED THERMAL SHOCK
SCREENING CRITERIA

The NRC has asked that the Palisades Plant forward Palisades specific thermal/hydraulic data which could be used by the NRC for their research effort in reevaluating 10CFR50.61 Pressurized Thermal Shock (PTS). A reevaluated 10CFR50.61 can potentially result in extending the date that Palisades reaches the PTS screening criteria. In order for the NRC to run calculations using RELAP5 for Palisades, Consumers Energy requested that Siemens Power Corporation (SPC) provide an input deck for ANF-RELAP, with accompanying calculation information, that the NRC can use as a starting point for this reevaluation effort. SPC has provided that information to Consumers Energy and has requested the information be controlled as proprietary.

The ANF-RELAP input deck used for Palisades LOEL analysis was enclosed in our December 7, 1999 submittal. The applicable calculation information which describes the development of this deck is being submitted by this letter as (Enclosure 1) in the form of three (3) calculation notebooks.

As required by 10CFR 2.790(b), an affidavit from Siemens Power Corporation is enclosed (Attachment 1) to support the withholding of proprietary information contained in the enclosed SPC calculation notebooks.

PPR A-DOCK 05000255

Change: NRC PPR

all incl
1 1/2 top up

APOI

SUMMARY OF COMMITMENTS

This letter contains no new commitments and no revisions to existing commitments.

A handwritten signature in black ink, appearing to read "N. Haskell for".

Nathan L. Haskell
Director, Licensing

CC Administrator, Region III, USNRC (w/o Enclosure)
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades (w/o Enclosure)

Attachment
Enclosure

ATTACHMENT 1

**CONSUMERS ENERGY COMPANY
PALISADES PLANT
DOCKET 50-255**

December 27, 1999

**AFFIDAVIT TO SUPPORT WITHHOLDING
OF SIEMENS POWER COMPANY
CALCULATION NOTEBOOKS SUPPORTING DEVELOPMENT
OF RELAP DECK FOR REEVALUATING
PRESSURIZED THERMAL SHOCK SCREENING CRITERIA**

3 Pages

A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, Jerald S. Holm, 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 SPC information transmitted by letters JRH:99:234 and JRH:99:245 referred to as "Documents." Information contained in these Documents has been classified by SPC as proprietary in accordance with the control system and policies established by SPC for the control and protection of proprietary and confidential information.
4. These Documents contain 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 these Documents as proprietary and confidential.
5. These Documents have been made available in confidence, with the request that the information contained in the Documents will not be disclosed or divulged.
6. These Documents contain 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 these Documents is considered to be proprietary by SPC because it reveals certain distinguishing aspects of SPC licensing methodology which secure competitive advantage to SPC for product 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 Documents.

8. The disclosure of the proprietary information contained in these Documents 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. These Documents contain 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 these Documents 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 these Documents provides insight into 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.

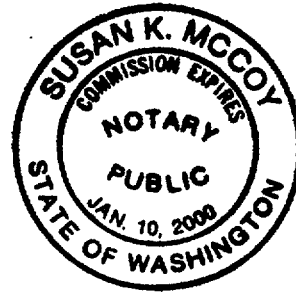
13. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Jerald S. Holm

SUBSCRIBED before me this 22
day of December 1999.

Susan K. McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 01/10/00



ENCLOSURE 1

**CONSUMERS ENERGY COMPANY
PALISADES PLANT
DOCKET 50-255**

December 27, 1999

**SIEMENS POWER CORPORATION
CALCULATION NOTEBOOKS SUPPORTING DEVELOPMENT
OF RELAP DECK FOR REEVALUATING
PRESSURIZED THERMAL SHOCK SCREENING CRITERIA**

Three (3) Books

1. LOEL Event Analysis Secondary Side Overpressurization, E-5772-595-2, Siemens Power Corporation, May 16, 1997.
2. Loss of Load Analysis with ANF Relap, E-5970-595-1, Siemens Power Corporation, April 9, 1993.
3. Palisades Cycle 9 - MSLB Analysis: ANF-RELAP Deck Development, E-5607-598-2, Siemens Power Corporation, June 12, 1990.