

February 23, 2000

James A. Hutton
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P. O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE,
LIMERICK GENERATING STATION, UNITS 1 AND 2
(TAC NOS. MA5922 AND MA5923)

Dear Mr. Hutton:

By PECO Energy Company letter of January 3, 2000, and General Electric Company's (GE) affidavit executed by David J. Robare dated December 22, 1999, you submitted the following document as Enclosure 2 and it was requested that it be withheld from public disclosure pursuant to 10 CFR 2.790: NEDC-32847P, "ARTS Flow-Dependent Limits with TBVOOS for Peach Bottom Atomic Power Station and Limerick Generating Station" dated June 1998.

GE stated that the submitted proprietary information should be considered exempt from mandatory public disclosure for the following reasons:

- a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies;
- b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product;
- c. The information identified in Attachment 2 to the letter dated January 3, 2000, is classified as proprietary because it contains detailed results of analytical models, methods, and processes, including computer codes, which GE has developed, obtained NRC approval of, and applied to perform evaluations of transients for the BWR.

The development and approval of the BWR transient analysis computer code used in this analysis was achieved at a significant cost, on the order of a million dollars, to GE.

The development of the evaluation process along with the interpretation and application of the analytical results is derived from the extensive experience data base that constitutes a major GE asset.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.790 and, on the basis of your statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, Enclosure 2 (listed above) submitted with PECO Energy Company's January 3, 2000, letter to the NRC, marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.790(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended and should be withheld from public disclosure.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

Sincerely,

/RA/

Bartholomew C. Buckley, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

cc: See next page

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Bartholomew C. Buckley, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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Limerick Generating Station, Units 1 & 2

cc:

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