



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

January 26, 2000  
NOC-AE-00000260  
File No.: G03.16  
STI: 31025997  
10CFR2.790

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498, STN 50-499  
Application for Withholding of Information from Public Disclosure

- Reference 1) Letter from Robert A. Gramm to William T. Cottle, "South Texas Project, Units 1 and 2 - Request for Exemption to Exclude Certain Components from the Scope of Special Treatment Requirements Required by Regulation; Request for Additional information," dated January 18, 2000
- 2) Letter from J. J. Sheppard to NRC Document Control Desk, "Request for Exemption to Exclude Certain Components from the Scope of Special Treatment Requirements Required by Regulation," dated July 13, 1999 (NOC-AE-000518)

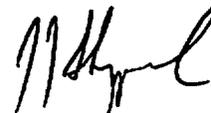
As requested in the above reference 1, attached for your information and use in reviewing the exemption request, reference 2, above, is a copy of the South Texas Project Risk Significance Basis Document (RSBD) for the Standby Diesel Generator and Support Systems. By this letter, South Texas Nuclear Operating Company (STPNOC) requests that the RSBD and information it contains be withheld from public disclosure under the provisions of 10 CFR 2.790(a)(4). In accordance with 10 CFR 2.790(b), the specific information and bases for withholding are detailed in the enclosed affidavit.

STPNOC believes that the enclosed affidavit sets forth sufficient grounds for withholding the identified information from public disclosure. In the event that the Nuclear Regulatory Commission does not agree, STPNOC specifically requests that it be so notified, with a statement of the reasons, in accordance with 10 CFR 2.790(c).

The enclosed RSBD for the Standby Diesel Generator and Support Systems bears a 1999 Copyright Notice. STP Nuclear Operating Company (STPNOC) hereby grants the NRC the authority to make the number of copies of this copyrighted publication which are necessary to fulfill its legal responsibilities with regards to public disclosure, and which are necessary for its use in connection with generic or plant-specific reviews or approvals, or the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation. This authorization is granted with the understanding that any copies

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Please contact Scott Head at (361) 972-7136 if you have any questions or require additional information.



**J. J. Sheppard**  
Vice President,  
Engineering & Technical Services

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**Attachment:** Affidavit

**Enclosure:** STP Risk Significance Basis Document, Standby Diesel Generator and Support Systems

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Attention: Document Control Desk  
Washington, D.C. 20555-0001

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter )  
 )  
STP Nuclear Operating Company, et al., ) Docket Nos. STN 50-498  
 ) STN 50-499  
South Texas Project )  
Units 1 and 2 )

AFFIDAVIT

I, J. J. Sheppard, being duly sworn, hereby depose and say that I am Vice President, Engineering & Technical Services of STP Nuclear Operating Company, and that I am duly authorized to sign and file with the Nuclear Regulatory Commission this Affidavit on behalf of the STP Nuclear Operating Company (STPNOC).

Further, I am authorized to apply for the withholding of information from disclosure. Specifically, STPNOC requests that the information contained in the South Texas Project Risk Significance Basis Document (RSBD) for the Standby Diesel Generator and Support Systems be withheld from public disclosure under the provisions of 10 CFR 2.790(a)(4). In this connection, I have personal knowledge of the criteria utilized by STPNOC in designating information as a trade secret or as confidential commercial information.

The RSBD presents the details of the STP risk significance determination process in a step-by-step fashion. The RSBD is based upon and integrates information and analytical techniques developed by STPNOC as the result of an extensive effort extending over a number of years at the expenditure of considerable station resources.

The integrated, risk significance determination process detailed in the RSBD can serve as the basis for exemptions from current regulatory requirements resulting in significant cost savings, estimated at more than \$2 million per year for the South Texas Project. The release of this information could thus result in the loss of an existing or potential competitive advantage for STPNOC, and would eliminate the potential for the South Texas Project to be compensated by others making this information available.

The following additional information is provided in accordance with 10 CFR 2.790(b)(4).

- a. The information contained in the RSBD -- in the form of an integrated, detailed, risk determination product -- has been held in confidence by STPNOC.
- b. The information is of a type customarily held in confidence by STPNOC, on a rational basis, and not customarily disclosed to the public.

