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

Attachment 2 is considered Not for Public Disclosure in accordance with 10CFR2.390.

April 10, 2007
NOC-AE-07002147
10CFR50.90
D43

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Supplementary Information for
STPNOC Alternate Source Term License Amendment Application

Reference: Letter from David W. Rencurrel, STPNOC, to NRC Document Control Desk dated March 22, 2007, "Request for License Amendment Related to Application of the Alternate Source Term" (TAC Nos. MD4996 and MD4997, NOC-AE-07002127)

STPNOC submitted a License Amendment request for the Alternate Source Term in the referenced correspondence. As agreed to with the Staff, STPNOC is providing the Staff copies of our analyses, computer code input decks, and meteorology data. These items are on the enclosed CD. A table of contents for the CD is provided in Attachment 1.

Attachment 2 (proprietary) provides the Containment Sump post-LOCA pH calculation, performed by Polestar Applied Technology, Inc. Confirmation of this information as proprietary to Polestar Applied Technology, Inc. is supported by the affidavit in Attachment 3 signed by Polestar Applied Technology, Inc., the owner of the information. This affidavit sets forth the basis on which the information may be withheld from public disclosure by the NRC and addresses with specificity the considerations in 10 CFR 2.390(b)(4). Accordingly, STPNOC requests that Attachment 2 be withheld from public disclosure. A non-proprietary version does not exist.

Correspondence with respect to the proprietary aspects of the sump pH calculation or the supporting Polestar affidavit should reference this letter and should be addressed to:

David Leaver
Polestar Applied Technology, Inc.
One First Street, Suite 4
Los Altos, CA 94022

There are no commitments in this letter.

STI: 32144069

Att'd CD resubmitted by LTR 6/6/2007

A001
NRC/NRR

If you have any questions, please contact Mr. D. E. Gore at 361-972-8909 or me at 361-972-7454.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 10, 2007.
Date

Charles T. Bowman
General Manager, Oversight

Awh

Enclosure: Alternate Source Term Data CD

Attachments:
1. Table of Contents for Alternate Source Term Data CD
2. Containment Sump post-LOCA pH Calculation **(Not for Public Disclosure)**
3. Affidavit for Withholding for Information in Attachment 2

cc:
(paper copy)

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Senior Resident Inspector
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P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

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Austin, TX 78704

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of State Health Services
1100 West 49th Street
Austin, TX 78756-3189

(electronic copy)

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP

* Mohan C. Thadani
U. S. Nuclear Regulatory Commission

Steve Winn
Christine Jacobs
Eddy Daniels
Marty Ryan
NRG South Texas LP

Ed Alarcon
J. J. Nesrsta
R. K. Temple
Kevin Pollo
City Public Service

Jon C. Wood
Cox Smith Matthews

C. Kirksey
City of Austin

Polestar
* David Leaver
* Jim Metcalf

* Including enclosure

Attachment 1

Table of Contents for Alternate Source Term Data CD

Contents of the STPNOC Calc/DataCD

File	Item
\CD_contents.doc (this file)	Content description of this CD
χ/Q ANALYSIS	
\calcs\meterology\NC-6509R0.pdf	χ\Q calculation
RAW MET DATA	
\calcs\meterology\RawMetData\RawDataListing.pdf	Text listing of raw data files
\calcs\meterology\RawMetData\ASCII\SQL_query.txt	SQL query which generated the 2001-2004 data file.
\calcs\meterology\RawMetData\ASCII\2001 to 2004 met data.txt	
\calcs\meterology\RawMetData\ASCII\Jan00.met	Monthly met data for 2000 in native output format (This was the format in which met data was produced until 2001).
\calcs\meterology\RawMetData\ASCII\Feb00.met	Monthly met data for 2000
\calcs\meterology\RawMetData\ASCII\Mar00.met	Monthly met data for 2000
\calcs\meterology\RawMetData\ASCII\Apr00.met	Monthly met data for 2000
\calcs\meterology\RawMetData\ASCII\May00.met	Monthly met data for 2000
\calcs\meterology\RawMetData\ASCII\Jun00.met	Monthly met data for 2000
\calcs\meterology\RawMetData\ASCII\Jul00.met	Monthly met data for 2000
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\calcs\meterology\RawMetData\ASCII\Nov00.met	Monthly met data for 2000
\calcs\meterology\RawMetData\ASCII\Dec00.met	Monthly met data for 2000
Joint Frequency Tables from Raw Met Data	
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\calcs\meterology\JFT\STP JFT 2000.xls	
\calcs\meterology\JFT\STP JFT 2001.xls	
\calcs\meterology\JFT\STP JFT 2002.xls	
\calcs\meterology\JFT\STP JFT 2003.xls	
\calcs\meterology\JFT\STP JFT 2004.xls	
OFFSITE χ/Q ANALYSIS	
\calcs\meterology\PAVAN\STPPAVAN.INP	PAVAN input file

Contents of the STPNOC Calc/DataCD

File	Item
\calcs\meterology\PAVAN\STPPAVAN.LOG	PAVAN output log file
\calcs\meterology\PAVAN\STPPAVAN.OUT	PAVAN output file

CONTROL ROOM & TECHNICAL SUPPORT CENTER χ/Q ANALYSIS
(ARCON96 case descriptions are provided on page 15 of calculation NC-6509, Rev. 0).

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Contents of the STPNOC Calc/DataCD

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\calcs\meterology\ARCON\stp2s3r2.log	ARCON96 case output
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\calcs\meterology\ARCON\stp1s1r2.cfd	Case Cumulative Freq Distribution
\calcs\meterology\ARCON\stp1s2r1.cfd	Case Cumulative Freq Distribution
\calcs\meterology\ARCON\stp1s2r2.cfd	Case Cumulative Freq Distribution
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\calcs\meterology\ARCON\STP_2003.LOG	ARCON96 case log output file
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PLANT DRAWINGS IN SUPPORT OF X/Q ANALYSIS

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\calcs\meterology\drawings\3M019C04053R4.tif	Concrete Mechanical and Electrical AUX Bldg Roof Plan @ EL 80'-00"
\calcs\meterology\drawings\3M019C04056R8.tif	Concrete Mechanical and Electrical AUX Bldg Roof Plan @ EL 80'-00"
\calcs\meterology\drawings\3M019C04059R9.tif	Concrete Mechanical and Electrical AUX Bldg Roof Plan @ EL 95'-00"
\calcs\meterology\drawings\3M019C04060R8.tif	Concrete Mechanical and Electrical AUX Bldg Roof Plan @ EL 95'-00"
\calcs\meterology\drawings\3M019C04064R12.tif	Concrete Mechanical and Electrical AUX Bldg Sections and Details

Contents of the STPNOC Calc/DataCD

File	Item
\calcs\meterology\drawings\6C189N05005R6.tif	General Arrangement Reactor Containment Building at EL 52'-0" Area G
\calcs\meterology\drawings\6C189N05008R8.tif	General Arrangement Reactor Containment Building Section B-B Area G
\calcs\meterology\drawings\6G019M00025R5.tif	General Arrangement Isolation Valve Cubicle Area 'E'
\calcs\meterology\drawings\6G019M00026R6.tif	General Arrangement Isolation Valve Cubicle Sections 'A-A' & 'B-B' Area 'E'
\calcs\meterology\drawings\9M131A01036R18.tif	Architecture Mechanical and Electrical Auxiliary BLDG Roof Plan Unit 1
\calcs\meterology\drawings\9M132A01036R10.tif	Architecture Mechanical and Electrical Auxiliary BLDG Roof Plan Unit 2
\calcs\meterology\drawings\9Y240Y0009R15.tif	Yard Civil Storm Drainage Detailed AUX Bldg Ares

LOSS OF COOLANT ACCIDENT (LOCA)
(Files for cases are defined on page 22 of the calculation)

\calcs\LOCA\nc6013r16.pdf	LOCA calculation
\calcs\LOCA\DCF_Files(inp)\1006fgrst.inp	RADTRAD DCF input file
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\calcs\LOCA\Model_Files(psf)\rb88case1pen. psf	RADTRAD Model file
\calcs\LOCA\Model_Files(psf)\rb88case1pur. psf	RADTRAD Model file
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\calcs\LOCA\Model_Files(psf)\rb88case2pur. psf	RADTRAD Model file
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Contents of the STPNOC Calc/DataCD

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\calcs\LOCA\Nuclide_Inventory_Files(nif)\strb88.nif	RADTRAD Nuclide inventory input
\calcs\LOCA\RFT_Files\eststst.rft	RADTRAD Release Fraction & Timing
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FUEL HANDLING ACCIDENT (FHA)

(This analysis was performed on a spreadsheet. Therefore, there are no RADTRAD files associated with the FHA.)

\calcs\FHA\NC-6508R0.pdf	FHA calculation

MAIN STEAM LINE BREAK (MSLB) ACCIDENT

(Files for cases are defined on page 30 of the calculation)

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\calcs\MSLB\AI_spike\INP\NC-6026_DCF.inp	RADTRAD DCF input file
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\calcs\MSLB\AI_spike\PSF\CaseX_Gas-OrgI_TSC.psf	RADTRAD Model file
\calcs\MSLB\AI_spike\PSF\CaseX_I2-Cs-Rb_CR.psf	RADTRAD Model file
\calcs\MSLB\AI_spike\PSF\CaseX_I2-Cs-Rb_TSC.psf	RADTRAD Model file
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\calcs\MSLB\AI_spike\PSF\CaseX_Gas-OrgI_TSC.o0	RADTRAD Case Output file
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\calcs\MSLB\PE _spike\PSF\CaseY_I2-Cs-Rb_CR.psf	RADTRAD Model file
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Contents of the STPNOC Calc/DataCD

File	Item
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\calcs\MSLB\PE_spike\RTF\NC-6026.rft	RADTRAD Release Fraction & Timing

STEAM GENERATOR TUBE RUPTURE (SGTR) ACCIDENT
(Files for cases are defined on page 36 of the calculation)

\calcs\SGTR \NC6034R5_Part1.pdf	SGTR calculation, Part 1
\calcs\SGTR \NC6034R5_Part2.pdf	SGTR calculation, Part 2
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Contents of the STPNOC Calc/DataCD

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\calcs\SGTR \Low_Temp\AI_Spike\Model_Files(psf)\NC-6034_Cs_I_Rb_TSC.psf	RADTRAD Model file
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\calcs\SGTR \Low_Temp\AI_Spike\Model_Files(psf)\NC-6034_Flash_TSC.o0	RADTRAD Case Output file
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\calcs\SGTR \Low_Temp\AI_Spike\Model_Files(psf)\NC-6034_Cs_I_Rb_TSC.o0	RADTRAD Case Output file
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\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Flash_TSC.psf	RADTRAD Model file
\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Cs_I_Rb_CR.psf	RADTRAD Model file
\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Cs_I_Rb_TSC.psf	RADTRAD Model file
\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Nobles_OrgI_TSC.o0	RADTRAD Case Output file
\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Nobles_OrgI_CR.o0	RADTRAD Case Output file
\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Flash_CR.o0	RADTRAD Case Output file

Contents of the STPNOC Calc/DataCD

File	Item
\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Flash_TSC.o0	RADTRAD Case Output file
\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Cs_I_Rb_CR.o0	RADTRAD Case Output file
\calcs\SGTR \Low_Temp\PE _Spike\Model_Files(psf)\NC-6034_Cs_I_Rb_TSC.o0	RADTRAD Case Output file
\calcs\SGTR \Low_Temp\PE _Spike\Nuclide_Inventory_Files(nif)\NC-6034_60uCi_RCS_CsIRb_PE.nif	RADTRAD Nuclide inventory input
\calcs\SGTR \Low_Temp\PE _Spike\Nuclide_Inventory_Files(nif)\NC-6034_60uCi_RCS_Nobles_&_OrgI_PE.nif	RADTRAD Nuclide inventory input
\calcs\SGTR \Low_Temp\PE _Spike\RFT_Files\NC-6034.rtf	RADTRAD Release Fraction & Timing

CONTROL ROD EJECTION ACCIDENT
(Files for cases are defined on page 29 of the calculation)

\calcs\CREA \nc6014.pdf	CREA calculation
\calcs\CREA \DCF_Files(inp)\NC-6014_DCF_KrXeICsRb.inp	RADTRAD DCF input file
\calcs\CREA \Model_Files(psf)\NC-6014_Sec_Leak_TSC_KrXe_OrgI.psf	RADTRAD Model file
\calcs\CREA \Model_Files(psf)\NC-6014_Sec_Leak_TSC_CsIRb.psf	RADTRAD Model file
\calcs\CREA \Model_Files(psf)\NC-6014_Sec_Leak_CR_KrXe_OrgI.psf	RADTRAD Model file
\calcs\CREA \Model_Files(psf)\NC-6014_Sec_Leak_CR_CsIRb.psf	RADTRAD Model file
\calcs\CREA \Model_Files(psf)\NC-6014_Cont_Leak_TSC.psf	RADTRAD Model file
\calcs\CREA \Model_Files(psf)\NC-6014_Cont_Leak_CR.psf	RADTRAD Model file
\calcs\CREA \Model_Files(psf)\NC-6014_Sec_Leak_TSC_KrXe_OrgI.o0	RADTRAD Case Output file
\calcs\CREA \Model_Files(psf)\NC-6014_Sec_Leak_TSC_CsIRb. o0	RADTRAD Case Output file
\calcs\CREA \Model_Files(psf)\NC-6014_Sec_Leak_CR_KrXe_OrgI. o0	RADTRAD Case Output file
\calcs\CREA \Model_Files(psf)\NC-6014_Sec_Leak_CR_CsIRb. o0	RADTRAD Case Output file
\calcs\CREA \Model_Files(psf)\NC-6014_Cont_Leak_TSC. o0	RADTRAD Case Output file
\calcs\CREA \Model_Files(psf)\NC-6014_Cont_Leak_CR. o0	RADTRAD Case Output file
\calcs\CREA \Nuclide_Inventory_Files(nif)\NC-6014_Cont_Leak_KrXeCsIRb.nif	RADTRAD Nuclide inventory input
\calcs\CREA \Nuclide_Inventory_Files(nif)\NC-6014_Sec_Leak_CsIRb.nif	RADTRAD Nuclide inventory input
\calcs\CREA \Nuclide_Inventory_Files(nif)\NC-6014_Sec_Leak_KrXe_OrgI.nif	RADTRAD Nuclide inventory input
\calcs\CREA \RFT_Files\NC-6014.rft	RADTRAD Release Fraction & Timing

LOCKED (RCP) ROTOR ACCIDENT
(Files for cases are defined on page 25 of the calculation)

\calcs\LRA \nc6028.pdf	LRA calculation
\calcs\LRA \DCF_Files(inp)\NC-6028_wCsRb_DCF.inp	RADTRAD DCF input file
\calcs\LRA \Model_Files(psf)\NC-6028_Uncover_TSC.psf	RADTRAD Model file
\calcs\LRA \Model_Files(psf)\NC-6028_Uncover_CR.psf	RADTRAD Model file
\calcs\LRA \Model_Files(psf)\NC-6028_Nobles_OrgI_TSC.psf	RADTRAD Model file

Contents of the STPNOC Calc/DataCD

File	Item
\calcs\LRA \Model_Files(psf)\NC-6028_Nobles_OrgI_CR.psf	RADTRAD Model file
\calcs\LRA \Model_Files(psf)\NC-6028_ICsRb_TSC.psf	RADTRAD Model file
\calcs\LRA \Model_Files(psf)\NC-6028_ICSRb_CR.psf	RADTRAD Model file
\calcs\LRA \Model_Files(psf)\NC-6028_Uncover_TSC.o0	RADTRAD Case Output file
\calcs\LRA \Model_Files(psf)\NC-6028_Uncover_CR.o0	RADTRAD Case Output file
\calcs\LRA \Model_Files(psf)\NC-6028_Nobles_OrgI_TSC. o0	RADTRAD Case Output file
\calcs\LRA \Model_Files(psf)\NC-6028_Nobles_OrgI_CR. o0	RADTRAD Case Output file
\calcs\LRA \Model_Files(psf)\NC-6028_ICsRb_TSC. o1	RADTRAD Case Output file
\calcs\LRA \Model_Files(psf)\NC-6028_ICSRb_CR. o1	RADTRAD Case Output file
\calcs\LRA \Nuclide_Inventory_Files(nif)\NC-6028_SG_Cover_ICSRb.nif	RADTRAD Nuclide inventory input
\calcs\LRA \Nuclide_Inventory_Files(nif)\NC-6028_SG_Cover_Nobles_OrgI.nif	RADTRAD Nuclide inventory input
\calcs\LRA \Nuclide_Inventory_Files(nif)\NC-6028_SG_Uncover.nif	RADTRAD Nuclide inventory input
\calcs\LRA \RTF_Files(rtf)\NC-6028.rft	RADTRAD Release Fraction & Timing

METEOROLOGY PROCEDURES

\Procedures\BUTowerCal\maintenance\0PMP08EM0002R4.pdf	Backup Met Tower Calibration: Electrical Maintenance, Rev 4: Eff 01/31/95
\Procedures\BUTowerCal\ maintenance\0PMP08EM0002R5.pdf	Backup Met Tower Calibration: Electrical Maintenance, Rev 5: Eff 10/01/02
\Procedures\BUTowerCal\surveillance\0PSP05EM0002R8.pdf	Backup Met Tower Calibration: Surveillance, Rev 8: Eff 12/01/99
\Procedures\BUTowerCal\surveillance\0PSP05EM0002R9.pdf	Backup Met Tower Calibration: Surveillance, Rev 9: Eff 06/18/01
\Procedures\BUTowerCal\ surveillance\0PSP05EM0002R10.pdf	Backup Met Tower Calibration: Surveillance, Rev 10: Eff 04/24/02
\Procedures\BUTowerCal\ surveillance\0PSP05EM0002R11.pdf	Backup Met Tower Calibration: Surveillance, Rev 11: Eff 12/05/02 to 08/08/05
\Procedures\MetData\0pgp03za0087r4.pdf	Meteorological data procedure (delineates the responsibilities for operational control, maintenance, collection, and reduction of meteorological data); Rev 4: Eff 03/30/98

Contents of the STPNOC Calc/DataCD

File	Item
\Procedures\MetData\0pgp03za0087r5.pdf	Meteorological data procedure; Rev 5: 01/22/02
\Procedures\MetData\0pgp03za0087r6.pdf	Meteorological data procedure; Rev 6: 10/22/03 to 12/08/05
\Procedures\PrimaryTowerCal\maintenance\0pmp08em0001r6.pdf	Primary Met Tower Calibration: Electrical Maintenance, Rev 6: Eff 01/23/95
\Procedures\PrimaryTowerCal\maintenance\0pmp08em0001r7.pdf	Primary Met Tower Calibration: Electrical Maintenance, Rev7: Eff 04/17/01 to 05/12/05
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r13.pdf	Primary Met Tower Calibration: Surveillance, Rev 13: Eff 09/19/98
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r14.pdf	Primary Met Tower Calibration: Surveillance ,Rev 14: Eff 08/01/00
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r15.pdf	Primary Met Tower Calibration: Surveillance, Rev 15: Eff 01/10/01
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r16.pdf	Primary Met Tower Calibration: Surveillance, Rev 16: Eff 04/04/01
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r17.pdf	Primary Met Tower Calibration: Surveillance, Rev 17: 04/24/02
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r18.pdf	Primary Met Tower Calibration: Surveillance, Rev 18: Eff 05/30/02
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r19.pdf	Primary Met Tower Calibration: Surveillance, Rev 19: Eff 08/08/02
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r20.pdf	Primary Met Tower Calibration: Surveillance, Rev 20: Eff 12/05/02
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r21.pdf	Primary Met Tower Calibration: Surveillance, Rev 21: Eff 07/09/03
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r22.pdf	Primary Met Tower Calibration: Surveillance, Rev 22: Eff 07/10/03
\Procedures\PrimaryTowerCal\surveillance\0psp05em0001r23.pdf	Primary Met Tower Calibration: Surveillance, Rev 23: Eff 09/01/04 to 05/23/05

Attachment 3

Affidavit for Withholding for Attachment 2

Adobe Acrobat 7.0
Document

(Icon for attachment in electronic copy)

Polestar Applied Technology, Inc.

AFFIDAVIT

I, David E.W. Leaver, being duly sworn, depose and state as follows:

(1) I am a Principal and an Officer of Polestar Applied Technology, Inc. ("Polestar") and am responsible for the function of reviewing the information described in paragraphs (2) and (8) which is sought to be withheld, and have been authorized to apply for its withholding.

(2) The information sought to be withheld is contained in portions of Polestar-prepared report NC-6511 (see paragraph (8)). This report has been prepared for South Texas Project Nuclear Operating Company (STPNOC) in support of an STPNOC submittal to NRC on alternate source term (AST). The Polestar report addresses post-accident sump pH at the South Texas Project.

(3) In making this application for withholding of proprietary information of which it is the owner, Polestar relies upon the exemption from disclosure set forth in the NRC regulations 10 CFR 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 2.390(a)(4)). The material for which exemption from disclosure is here sought is all "confidential commercial information".

(4) Some examples of categories of information which fit into the definition of proprietary information are:

a. Information that discloses a process or method, including supporting data and analyses, where prevention of its use by Polestar's competitors without license from Polestar constitutes a competitive economic advantage over other companies.

b. Information which, if used by a competitor, would significantly reduce his expenditure of resources or improve his competitive position in the analysis, design, assurance of quality, or licensing of a similar product;

c. Information which reveals cost or price information, production capacities, budget levels, or commercial strategies of Polestar, its customers, or its suppliers;

d. Information which reveals aspects of past, present, or future Polestar customer-funded development plans and programs, of potential commercial value to Polestar;

e. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in both paragraphs (4)a and (4)b, above.

(5) The information sought to be withheld was submitted to STPNOC (and, we trust, to NRC) in confidence. The information is of a sort customarily held in confidence by Polestar, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by Polestar, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.

(6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Distribution of such documents within Polestar is limited to those with a need to know.

(7) The approval of external release of such a document typically requires review by the project manager, and the Polestar Principal closest to the work, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside Polestar are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.

(8) The information identified in paragraph (2), above, is classified as proprietary because it contains detailed information on and results from trade secret methodologies developed by Polestar and applied under the Polestar 10 CFR 50, Appendix B Quality Assurance Program. The trade secret information is identified in **[[**double bold brackets**]]** in the calculation. Specifically:

Page 5 – dealing with Assumption 2 related to Polestar's knowledge of possible forms of acids in containment and how to address these in a pH calculation.

Page 6 – a list of key references that were used in Polestar's pH models

Pages 8, 9, and 10 – details of the calculation of conversion factors used in the determination of the amount of acid generated by the cables

Page 11 – information on the calculation of the trisodium phosphate, boron buffer

Pages 12, 13, 14, and 15 – details on the calculation of re-evolution of iodine in reduced pH environment

Pages A1 – A3 – the inputs and outputs of the Polestar pH calculational models

The trade secrets used in this South Texas Project work are several of a number of Polestar developed methods, models, and codes. Development of these methods, models, and codes was achieved at a significant cost to Polestar, well over $200,000, which is a significant fraction of internal research and development resources available to a company the size of Polestar.

The development of the methods, models and codes, along with the interpretation and application of the results, is derived from the extensive experience database that constitutes a major Polestar asset.

(9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to Polestar's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of Polestar's comprehensive technology base on application of the AST to operating plants and advanced light water reactors, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology and includes development of the expertise to determine and apply the appropriate evaluation process. In addition, the technology base includes the value derived from providing analyses done with methods which have been developed and are being maintained in accordance with 10 CFR 50, Appendix B requirements.

The research, development, engineering, analytical and review costs comprise a substantial investment of time and money by Polestar.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

Polestar's competitive advantage will be lost if its competitors are able to use the results of the Polestar experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to Polestar would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive Polestar of the opportunity to exercise its competitive advantage to seek an adequate return on its relatively large investment in developing these very valuable analytical tools.

STATE OF CALIFORNIA)
) ss:
COUNTY OF SANTA CLARA)

David E.W. Leaver, is being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at Los Altos, California, this 2nd day of April 2007.

David E.W. Leaver
Polestar Applied Technology, Inc.

Subscribed and sworn before me this 2nd day of April 2007.

RUTH TUBBS
Commission # 1439944
Notary Public - California
Santa Clara County
My Comm. Expires Oct 8, 2007

Notary Public, State of California