

fracture proof design corporation

April 29, 1983

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Application for Withholding From Public Disclosure

Gentlemen:

We are transmitting herewith, five (5) copies of a report entitled "Fracture Mechanics Analysis of the Indian Point Unit 3 Nuclear Generating Station Steam Generator Girth Weld Cracks Under Pressurized Thermal Shock Conditions" (PROPRIETARY). Pursuant to 10CFR 2.790, as amended, of the Rules and Regulations of the Commission, we hereby request that the information contained in the report be withheld from public disclosure for the following reasons.

1. The methodology used to perform the analysis in the subject report was developed solely at the expense of Fracture Proof Design Corporation (FPDC).
2. The methods of analysis used are proprietary to FPDC and have not been disclosed to the public or The Power Authority of the State of New York (PASNY) except for those persons who have complied with Paragraph 4 below.
3. The development of certain of the methods of analysis involving the techniques used in this report are not published elsewhere in the literature.
4. Any person who has access to this information, including employees of FPDC, has signed agreements of non-disclosure and confidential treatment of said proprietary information.
5. FPDC is presently in a very strong competitive position because of its exclusive knowledge of these methods of analysis and disclosure of information in the subject report would irreparably damage the competitive position of FPDC.
6. PASNY has not paid fees equivalent to the cost of development of the technology used in preparation of the subject report. The total fees received for the analysis represent less than ten percent of the value, to FPDC, of the methodology.
7. One copy of the report has been given to a PASNY employee who has complied with Paragraph 4 above.

8305060417 830503
PDR ADDCK 05000286
P PDR

Page 2

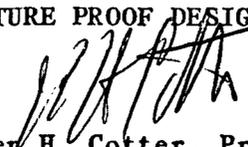
April 29, 1983

Director of Nuclear Reactor Regulation

Please address any questions regarding this matter to Keyren H. Cotter,
President, FPDC at the above address.

Sincerely,

FRACTURE PROOF DESIGN CORPORATION



Keyren H. Cotter, President

KHC:ss

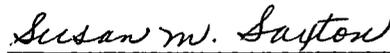
Enclosures

Affiant further states that the foregoing statements are true and accurate to the best of his knowledge and belief, and he hereby acknowledges that he has executed this Affidavit as his own free act and deed.



Keyren H. Cotter

Subscribed and sworn to before me this 29th day of April, 1983.



Notary Public

My Commission Expires:

SUSAN M. SAXTON
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS CITY
MY COMMISSION EXPIRES APRIL 9 1985