



Southern California Edison Company

23 PARKER STREET
IRVINE, CALIFORNIA 92718

August 27, 1992

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Subject: Docket Nos. 50-206, 50-361, and 50-362
Generic Letter 92-01, Revision 1, "Reactor Vessel
Structural Integrity, 10CFR50.54(f)."
San Onofre Nuclear Generating Station Units 2 and 3

Reference: R. M. Rosenblum (SCE) to Document Control Desk (NRC)
letter dated July 6, 1992.

In the referenced letter, Southern California Edison Company (SCE) responded to NRC Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10CFR50.54(f)." Attachments A and B of our response were prepared based on reactor vessel certified material test reports (CMTR's) from Combustion Engineering, Inc. (CE) and contained information proprietary to CE. As a result, Attachment C of our response was an affidavit from CE requesting that the proprietary information be withheld from public disclosure in accordance with 10 CFR 2.790.

During a subsequent telephone conversation with Mr. M. Fields, NRR Project Manager, Mr. Fields requested that CE revise their affidavit to explicitly identify the proprietary information. Accordingly, Enclosure 1 to this letter provides a revised CE affidavit. Please replace Attachment C of our July 6, 1992, submittal with Enclosure 1 to this letter. Also, please replace Appendix C of Attachment A and Appendix C of Attachment B of our July 6, 1992, letter with Enclosures 2 and 3 of this letter, which contain the "proprietary stamped" replacement pages.

If you have any questions, please contact me.

Very truly yours,

Walter C. Marsh
Assistant Manager,
Nuclear Regulatory Affairs

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Enclosures

cc: J. B. Martin, Regional Administrator, NRC Region V
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2&3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

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Enclosure 1

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, S. A. Toelle, depose and say that I am the Manager, Nuclear Licensing, of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations in conjunction with Southern California Edison Company for withholding this information.

The information for which proprietary treatment is sought is contained in the following documents attached to Southern California Edison Company Letter AD12S023 dated July 6, 1992:

Appendix C of Attachment A, "SONGS, Unit 2: MCRs for Beltline Materials"

Appendix C of Attachment B, "SONGS, Unit 3: MCRs for Beltline Materials"

These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure, which is owned and has been held in confidence by Combustion Engineering, is the fabrication specifications, certifications, and chemical analysis for the reactor vessel plate and welding materials.
2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to Combustion Engineering.
3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F. M. Stern to Frank Schroeder dated December 2, 1974.

This system was applied in determining that the subject document herein is proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.
5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:
 - a. A similar product is manufactured and sold by major pressurized water reactor competitors of Combustion Engineering.
 - b. Development of this information by C-E required thousands of manhours and millions of dollars. To the best of my knowledge and belief, a competitor would have to undergo similar expense in generating equivalent information.
 - c. In order to acquire such information, a competitor would also require considerable time and inconvenience to develop

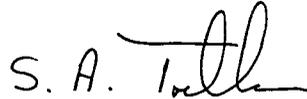
similar fabrication specifications, certifications, and chemical analysis for the reactor vessel plate and welding materials.

- d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.
- e. The information consists of the fabrication specifications, certifications, and chemical analysis for the reactor vessel plate and welding materials, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to

sell at prices reflecting significantly lower costs.

- g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.



S. A. Toelle
Manager
Nuclear Licensing

Sworn to before me
this 20th day of August, 1992


Notary Public

My commission expires: 3/31/94

Enclosure 2