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SUBJECT: Forwards response to question on Section 5.2.7,fuel damage due to external forces of ANF-89-164(NP).

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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RESPONSE TO QUESTION RE: SEISMIC RESPONSE

Gentlemen:

During a review of ANF-89-164(NP) "Mechanical Licensing Report for H. B. Robinson High Thermal Performance Fuel Assemblies", a question was raised by Dr. S. L. Wu (NRC) concerning seismic response of the mixed core. A response was provided informally by Advanced Nuclear Fuels Corporation. The attachment to this letter formally documents the response.

ANF considers the information contained in the attachment (RAC:130:90) to be proprietary. In accordance with 10CFR2.790(b) the enclosed affidavit executed by Mr. H. E. Williamson of ANF provides the necessary information to support withholding this document from public disclosure.

Questions regarding this matter may be referred to Mr. R. W. Prunty at (919) 546-7318.

Yours very truly,

L. I. Loflin
Manager
Nuclear Licensing Section

JSK/cwh (876RNP)

Attachment

cc: Mr. S. D. Ebneter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo
Dr. S. L. Wu

A001
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411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, H. E. Williamson being duly sworn, hereby say and depose:

1. I am Manager, Fuel Engiineering and Licensing, for Advanced Nuclear Fuels Corporation, ("ANF"), and as such I am authorized to execute this Affidavit.

2. I am familiar with ANF's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the report RAC:130:90 entitled "Response to NRC Question on Mixed Core Seismic Behavior," referred to as "Document." Information contained in this Document has been classified by ANF as proprietary in accordance with the control system and policies established by ANF for the control and protection of information.

4. The Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by ANF and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as proprietary and confidential.

5. The Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document will not be disclosed or divulged.

6. The Document contains information which is vital to a competitive advantage of ANF and would be helpful to competitors of ANF when competing with ANF.

7. The information contained in the Document is considered to be proprietary by ANF because it reveals certain distinguishing aspects of ANF licensing methodology which secure competitive advantage to ANF for fuel design optimization and marketability, and includes information utilized by ANF in its business which affords ANF an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

8. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it valuable insights into ANF licensing methodology and would result in substantial harm to the competitive position of ANF.

9. The Document contains proprietary information which is held in confidence by ANF and is not available in public sources.

10. In accordance with ANF's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside ANF only as required and under suitable agreement providing for nondisclosure and limited use of the information.

11. ANF policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

12. Information in this Document provides insight into ANF licensing methodology developed by ANF. ANF has invested significant resources in developing the methodology as well as the strategy for this application. Assuming a competitor had available the same background data and incentives as ANF, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ANF.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.

R. E. Williamson

SUBSCRIBED before me this 6th

day of November, 1990.

Susan K. McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/10/92