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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261  
 AUTH. NAME AUTHOR AFFILIATION  
 WARD, G. N. Advanced Nuclear Fuels Corp. (formerly Exxon Nuclear Co., I  
 RECIP. NAME RECIPIENT AFFILIATION  
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SUBJECT: Forwards affidavit providing necessary info to allow  
 withholding of proprietary info from public disclosure as  
 required by 10CFR2.790(b).

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**ADVANCED NUCLEAR FUELS CORPORATION**

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FUEL ENGINEERING &  
TECHNICAL SERVICES

July 14, 1987  
GNW:060:87

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

Attention: Mr. T. E. Collins

Dear Sir:

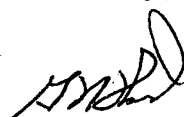
Subject: Transmittal of H.B. Robinson Core and Operating Data

One copy of the compilation of the fuel assembly and core loading pattern information for H.B. Robinson has been forwarded to Mr. John Carew of Brookhaven National Laboratory (BNL). The data includes fuel assembly and loading pattern information for Cycles 9 through 12. It is our understanding that the data will be used in benchmarking calculations at BNL.

The report provided to BNL is considered proprietary to Advanced Nuclear Fuels Corporation. The Affidavit enclosed provides the necessary information to allow the withholding of the proprietary information from public disclosure as required by 10 CFR 2.790(b).

If you have any questions regarding this transmittal, please contact me at (509) 375-8563.

Sincerely,



G. N. Ward, Manager  
Reload Licensing

GNW:11h

Enclosure

cc: Mr. John Carew  
Bldg. 475-B  
Brookhaven National Laboratory  
Upton  
Long Island, New York 11973-5000

Mr. Tom Dresser (Carolina Power & Light) (w/o Enclosure)

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AN AFFILIATE OF KRAFTWERK UNION



Aoo!  
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A F F I D A V I T

STATE OF WASHINGTON    )  
                              ) ss.  
COUNTY OF BENTON        )

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

1. I am Manager, Licensing and Safety Engineering, 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 transmitted by letter, GNW:060:87, describing the H.B. Robinson core and operating data. This report will be 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 bench mark data relative to PWR Gadolinia fuel and core designs 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 extremely valuable insights into PWR Gadolinia fuel and core designs 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 non-disclosure 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. This Document provides information which reveals PWR Gadolinia fuel and core designs developed by ANF over the past several years. ANF has invested many thousands of dollars and many man-months of effort in developing the PWR Gadolinia fuel and core designs revealed in the Document. 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.

*A. E. Williamson*

SWORN TO AND SUBSCRIBED

before me this 16<sup>th</sup> day of

July, 1987.

*Helen R. Fitzgerald*

NOTARY PUBLIC