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 MANGAN, C. V. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Informs that info contained in June 1987 GE Rept
 NEDC-31446P, "Safer/Corecool/GESTR LOCA Analysis," be
 withheld from public disclosure. Affidavit containing reasons
 encl. Encl withheld (ref 10CFR2.790).

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September 14, 1987
NMP1L 1086

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

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Gentlemen:

On August 21, 1987, Niagara Mohawk submitted a request for a change to the Technical Specification of Nine Mile Point Unit 1. Attached to that submittal was a copy of General Electric Report NEDC-31446P, June 1987, "SAFER/CORECOOL/GESTR-LOCA LOSS-OF-COOLANT ACCIDENT ANALYSIS." The information contained in this report is considered by General Electric to be proprietary information exempt from public disclosure in accordance with Section 2.790(a)(4) of the Commission's regulations.

Accordingly, pursuant to Section 2.790(b)(1) of the Commission's regulations, Niagara Mohawk Power Corporation hereby makes application to withhold from public disclosure the foresaid document. In support of this application, enclosed herewith is an Affidavit containing a full statement of the reasons for this request for withholding from public disclosure executed by Mr. Ricardo Artigas, Manager, Licensing and Consulting Services, General Electric Company.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangan
C. V. Mangan
Senior Vice President

GAG/pns
3653G
Attachment

xc: Regional Administrator, Region I
Mr. R. A. Capra, Director
Mr. R. A. Benedict, Project Manager
Mr. W. A. Cook, Resident Inspector

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PDR ADDCK 05000220
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GENERAL  ELECTRIC

NUCLEAR ENERGY BUSINESS OPERATIONS
GENERAL ELECTRIC COMPANY • 175 CURTNER AVENUE • SAN JOSE, CALIFORNIA 95125

TRA-NM-87017
August 25, 1987

Mr. PE Netusil
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, NY 13212

Subject: Affidavit for NEDC-31446P
Nine Mile Point Unit 1
SAFER/CORECOOL/GESTR-LOCA Analysis Report

Dear Mr. Netusil:

In anticipation of the NRC's requirements for information classified as proprietary, enclosed is the affidavit which should accompany the subject licensing report when it is submitted to the NRC.

Also, later this week, I will be sending you copies of the nonproprietary version of the subject report which can be given to the NRC.

Please call me if you have any questions concerning this transmittal.

Very truly yours,


TR Augello
Services Program Manager

jmh
cc: WH Hetzel
RW Pulsifer
WA Zarbus



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GENERAL ELECTRIC COMPANY

AFFIDAVIT

I, Ricardo Artigas, being duly sworn, depose and state as follows:

1. I am Manager, Licensing and Consulting Services, General Electric Company, and have been delegated the function of reviewing the information described in paragraph 2 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 "Nine Mile Point Unit One SAFER/CORECOOL/GESTR-LOCA Loss-of-Coolant Accident Analysis", NEDC-31446P, June 1987.
3. In designating material as proprietary, General Electric utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it . . . A substantial element of secrecy must exist so that, except by the use of improper means, there would be difficulty in acquiring information . . . Some factors to be considered in determining whether given information is one's trade secret are: 1) the extent to which the information is known outside of his business; 2) the extent to which it is known by employees and others involved in his business; 3) the extent of measures taken by him to guard the secrecy of the information; 4) the value of the information to him and to his competitors; 5) the amount of effort or money expended by him in developing the information; 6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
 - a. Information that discloses a process, method or apparatus where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies;
 - b. Information consisting of supporting data and analyses, including test data, relative to a process, method or apparatus, the application of which provide a competitive economic advantage, e.g., by optimization or improved marketability;
 - c. Information which if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product;

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY

RESEARCH REPORT
NO. 1000
BY
J. H. GOLDSTEIN
AND
R. F. W. WILSON

APPENDIX

TABLE I

Summary of experimental conditions and results

- d. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of General Electric, its customers or suppliers;
 - e. Information which reveals aspects of past, present or future General Electric customer-funded development plans and programs of potential commercial value to General Electric;
 - f. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
 - g. Information which General Electric must treat as proprietary according to agreements with other parties.
5. In addition to proprietary treatment given to material meeting the standards enumerated above, General Electric customarily maintains, in confidence, preliminary and draft material which has not been subject to complete proprietary, technical and editorial review. This practice is based on the fact that draft documents often do not appropriately reflect all aspects of a problem, may contain tentative conclusions and may contain errors that can be corrected during normal review and approval procedures. Also, until the final document is completed, it may not be possible to make any definitive determination as to its proprietary nature. General Electric is not generally willing to release such a document to the general public in such a preliminary form. Such documents are, however, on occasion furnished to the NRC staff on a confidential basis because it is General Electric's belief that it is in the public interest for the staff to be promptly furnished with significant or potentially significant information. Furnishing the document on a confidential basis pending completion of General Electric's internal review permits early acquaintance of the staff with the information while protecting General Electric's potential proprietary position and permitting General Electric to insure the public documents are technically accurate and correct.
 6. Initial approval of proprietary treatment of a document is made by the manager of the originating component, the individual most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the Company is limited on a "need to know" basis, and such documents at all times are clearly identified as proprietary.
 7. The procedure for approval of external release of such a document is reviewed by the section manager, project manager, principal scientist or other equivalent authority, by the section manager of the cognizant marketing function (or his delegate) and by the legal operation for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside General Electric are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees only in accordance with appropriate regulatory provisions or proprietary agreements.
 8. The document mentioned in paragraph 2 above has been evaluated in accordance with the above criteria and procedures and has been found to contain information which is proprietary and which is customarily held in confidence by General Electric.

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The first part of the document
 discusses the general principles
 of the system and the
 various components involved.
 It also covers the
 basic operations and
 the maintenance procedures.
 The second part of the document
 provides a detailed description
 of the hardware and software
 components. It includes
 information on the
 system architecture and
 the data flow. The
 third part of the document
 describes the testing and
 validation procedures. It
 includes information on the
 test cases and the results.
 The fourth part of the document
 describes the implementation
 and deployment procedures. It
 includes information on the
 installation and the
 configuration of the system.
 The fifth part of the document
 describes the user training
 and support procedures. It
 includes information on the
 training materials and the
 support services.

The document is organized into
 several sections. The first
 section is the Introduction,
 which provides an overview of
 the document. The second
 section is the System
 Description, which describes
 the system and its components.
 The third section is the
 Hardware and Software
 Description, which provides
 a detailed description of the
 hardware and software
 components. The fourth
 section is the Testing and
 Validation, which describes
 the testing and validation
 procedures. The fifth
 section is the Implementation
 and Deployment, which
 describes the implementation
 and deployment procedures.
 The sixth section is the
 User Training and Support,
 which describes the user
 training and support
 procedures.

Appendix A
 Appendix B
 Appendix C

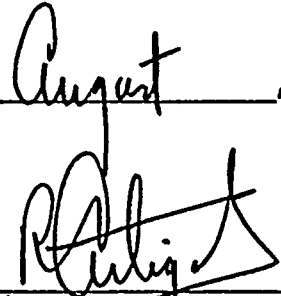
9. The information, to the best of my knowledge and belief, has consistently been held in confidence by the General Electric Company, no public disclosures have been made, and it is not available in public sources. All disclosures to third parties have been made pursuant to regulatory provisions of proprietary agreements which provide for maintenance of the information in confidence.
10. Public disclosure of the information sought to be withheld is likely to cause substantial harm to the competitive position of the General Electric Company and deprive or reduce the availability of profitmaking opportunities because it would provide other parties, including competitors, with valuable information regarding analysis inputs and results using the SAFER/GESTR-LOCA methodology, which were obtained at considerable cost to the General Electric Company.

STATE OF CALIFORNIA)
COUNTY OF SANTA CLARA) ss:

Ricardo Artigas, being duly sworn, deposes and says:

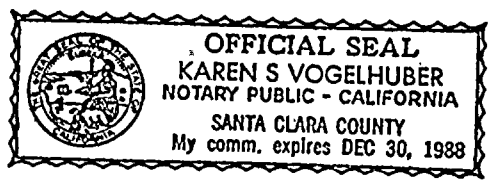
That he has read the foregoing affidavit, and the matters stated therein are true and correct to the best of his knowledge, information and belief.

Executed at San Jose, California, this 25th day of August, 1987.



Ricardo Artigas
General Electric Company

Subscribed and sworn before me this 25th day of August, 1987.





NOTARY PUBLIC, STATE OF CALIFORNIA

The first part of the document discusses the importance of maintaining accurate records. It states that proper record-keeping is essential for the efficient operation of any organization. This includes tracking financial transactions, inventory levels, and personnel records.

In addition, the document emphasizes the need for regular audits and reviews. These processes help to identify discrepancies, prevent fraud, and ensure that all activities are in compliance with applicable laws and regulations.

Finally, the document highlights the role of technology in modern record-keeping. The use of digital databases and software solutions can significantly improve the accuracy and accessibility of records, while also reducing the risk of data loss.

The second part of the document focuses on the challenges of data management. As organizations grow, the volume of data they generate increases exponentially. This can lead to information overload, making it difficult to find and analyze the data that is most relevant to the organization's needs.

To address these challenges, the document suggests implementing data governance policies. These policies define the roles and responsibilities of different departments in managing data, ensuring its quality, and protecting it from unauthorized access.

Furthermore, the document recommends investing in data analytics tools. These tools can help organizations to uncover hidden patterns and trends in their data, providing valuable insights that can inform strategic decision-making.

The third part of the document discusses the importance of data security. In an era where cyber threats are becoming increasingly sophisticated, it is crucial for organizations to take proactive measures to protect their data. This includes implementing strong password policies, using encryption, and regularly updating software.

Additionally, the document stresses the importance of employee training. Employees should be educated on the risks of phishing attacks and other common security threats, as well as the proper procedures for reporting any suspicious activity.

Finally, the document mentions the need for a disaster recovery plan. This plan should outline the steps to be taken in the event of a data breach or system outage, ensuring that the organization can quickly restore its operations and minimize any potential damage.

The fourth part of the document addresses the issue of data privacy. With the increasing use of personal data, organizations have a legal and ethical obligation to protect this information. This involves obtaining explicit consent from individuals before collecting their data and providing them with the ability to access, update, or delete their information.

The document also discusses the importance of data minimization. Organizations should only collect and retain the data that is necessary for their intended purposes, and should delete it once it is no longer needed.

Finally, the document mentions the need for transparency. Organizations should be open about how they collect, use, and share data, and should provide clear privacy policies that are easy for individuals to understand.

In conclusion, the document emphasizes that effective data management is a multi-faceted task. It requires a combination of strong policies, robust technology, and a commitment to security and privacy. By following the guidelines outlined in this document, organizations can ensure that their data is managed in a way that supports their long-term success.