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 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania 05000387
 AUTH. NAME AUTHOR AFFILIATION
 CURTIS, N.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 BUTLER, W. Licensing Branch 2

SUBJECT: Forwards affidavit requesting withholding of NEDE-30121, "Environ Qualification Rept - HPCI Steam Turbine..." & NEDM-30140, "Dynamic Qualification Records - Seismic..." per 10CFR2.790.

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NOTES: 1cy NMSS/FCAF/PM. LPDR 2cys Transcripts. 05000387
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1. The first part of the report deals with the general situation in the country. It is a very interesting and informative study of the economic and social conditions of the country at that time.

2. The second part of the report deals with the specific measures taken by the government to improve the economic and social conditions of the country. It is a very detailed and thorough study of the various measures taken by the government.

3. The third part of the report deals with the results of the measures taken by the government. It is a very clear and concise summary of the achievements of the government in the various fields.

4. The fourth part of the report deals with the conclusions drawn from the study. It is a very thoughtful and well-reasoned analysis of the various factors that have influenced the development of the country.



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215/770-7501

JUL 12 1985

Director of Nuclear Reactor Regulation
Attention: Dr. W. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
AFFIDAVITS CONCERNING PROPRIETARY INFORMATION
ER 100450 FILE 841-1
PLA-2508

Docket No. 50-387

Dear Dr. Butler:

On June 5, 1985 PLA-2478 forwarded to the NRC copies of the following two reports:

- 1) General Electric Company, Susquehanna Steam Electric Station Units 1 & 2, Environmental Qualification Report - HPCI Steam Turbine Assembly (E41-C002, CCS Terry Corporation)
NEDE-30121 3/22/83
- 2) General Electric Company, Susquehanna Steam Electric Station Dynamic Qualification Records - Seismic Qualification Test of the Power Range Monitor Cabinet and Supplementary Test Specimens (Final Test Report)
NEDM-30140 5/20/83

The above referenced reports contained information considered proprietary to the General Electric Company and, therefore, should not be placed in the public record by any governmental agency.

In accordance with our discussion with M. J. Campagnone of your staff, enclosed with this letter are affidavits as required by Title 10 to the Code of Federal Regulations Part 2 Section 2.790.

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The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, regarding the land described in the foregoing:

Section 1, Township 10N, Range 10E, T10N, R10E, S1, contains 360 acres of land, of which 360 acres are owned by the United States.

Page 1 of 1

The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, regarding the land described in the foregoing:

Section 1, Township 10N, Range 10E, T10N, R10E, S1, contains 360 acres of land, of which 360 acres are owned by the United States.

The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, regarding the land described in the foregoing:

Section 1, Township 10N, Range 10E, T10N, R10E, S1, contains 360 acres of land, of which 360 acres are owned by the United States.

The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, regarding the land described in the foregoing:

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SSES PLA-2508
ER 100450 File 841-1
Dr. W. Butler

Should you have any questions, please contact W. W. Williams at
(215) 770-7856.

Very truly yours,



N. W. Curtis
Vice President-Engineering & Construction-Nuclear

cc: M. J. Campagnone NRC w/ attachment
R. H. Jacobs NRC w/ attachment

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GENERAL ELECTRIC COMPANY

AFFIDAVIT

I, Rudolph Villa, being duly sworn, depose and state as follows:

1. I am Manager, Products Licensing, 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 the report entitled "General Electric Company, Susquehanna Steam Electric Station, Dynamic Qualification Records - Seismic Qualification Test of the Power Range Monitor Cabinet and Supplementary Test Specimens (Final Test Report), NEDM-30140 5/20/83".
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;
 - 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 Subsection Manager of the originating component, the man 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.
9. The detailed test data, test instrumentation drawings, and test process data are considered proprietary.
10. The information to the best of my knowledge and belief has consistently been held in confidence by the General Electric Company. No public disclosure has been made, and it is not available in public sources. Also, disclosures to third parties have been made pursuant to regulatory provisions for proprietary agreements which provide for maintenance of the information in confidence.
11. 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 profit-making opportunities because over \$300,000 in testing and document research were required to obtain this information.

STATE OF CALIFORNIA)
COUNTY OF SANTA CLARA) ss:

Rudolph Villa, 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 1st day of July, 1985.



Rudolph Villa
General Electric Company

Subscribed and sworn before me this 1st day of July, 1985.





Paula F. Hussey
NOTARY PUBLIC, STATE OF CALIFORNIA



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