REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:7902120193 DOC.DATE: 79/02/05 NOTARIZED: YES DOCKET #
FACIL:50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
AUTH.NAME AUTHOR AFFILIATION
UHRIG,R.E. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
STELLO,V. Division of Operating Reactors

SUBJECT: Submits info re steam generator cleaning process solvent formulation.Info withhedl (ref 10CFR2.790).Affidavit encl.

DISTRIBUTION CODE: PA01S COPIES RECEIVED:LTR 3 ENCL 3 SIZE: 5
TITLE: PROPRIETARY INFO AFTER ISSUANCE OF LICENSE.

NOTES:

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	11 TA/EDO	1	[redacted]	12 CORE PERF BR	1	
	13 AD SYS, PROJ	1		14 ENGR BR	1	
	15 REAC SFTY BR	1		16 PLANT SYS BR	1	
	17 EEB	1		18 EFFL TRT SYS	1	
	BRINKMAN	1	0	NRC PDR	1	0
	OELD	1	0			
EXTERNAL:	19 ACRS	16	[redacted]	LPDR	1	0
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NOTES: 2 CYS ADVANCED TO V NOONAN #2-3
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FEB 14 1979

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GD

P. O. BOX 013100, MIAMI, FL 33101

FLORIDA POWER & LIGHT COMPANY

February 5, 1979
L-79-33

WITHHOLD ENCLOSURES FROM PUBLIC DISCLOSURE

Office of Nuclear Reactor Regulation
Attention: Mr. Victor Stello, Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stello:

Re: St. Lucie Unit No. 1
Docket No. 50-335
Cleaning of Steam Generators

One copy of proprietary information relating to the Dow Chemical Company steam generator cleaning process solvent formulation is enclosed for your information. This information is being submitted to satisfy a commitment made in our letter L-78-390 dated December 18, 1978.

Due to the proprietary nature of the information, the Dow Chemical Company has requested that the material enclosed be withheld from public disclosure in accordance with 10 CFR 2.790. An application from the Dow Chemical Company to that effect and an affidavit which supports that request are also enclosed.

As stated in our previous letter, FPL will continue to keep the Commission informed of the status of the program and to provide supplemental information as it becomes available, or is requested.

Yours very truly,

Robert E. Uhrig
Vice President

REU:TG:cf
Enclosures

cc: Mr. James P. O'Reilly, Region II, w/o enclosures
Harold F. Reis, Esquire, w/o enclosures

WITHHOLD ENCLOSURES FROM PUBLIC DISCLOSURE

7902120193

PROJECT PA01 (LTR) S 3/3 2 CYS ADVANCED TO V. NOONAN SEND 3RD CY TO BRG FILE

DOCKET NO. 50-335

DATE: 2-14-79

NOTE TO NRC AND/OR LOCAL PUBLIC DOCUMENT ROOMS

The following item submitted with letter dated 2-5-79 from FPL is being withheld from public disclosure in accordance with Section 2.790.

PROPRIETARY INFORMATION

Info on steam generator cleaning process solvent

Don Lawlow
016

Distribution Service's Branch

THE DOW CHEMICAL COMPANY

MIDLAND, MICHIGAN 48640

January 15, 1979

Director
Office of Nuclear Reactor Regulation
United States Nuclear Reactor Commission
Washington, D. C. 20555

Re: Florida Power & Light Co. Steam Generator Chemical Cleaning Program for St. Lucie Plant Unit No. 1

APPLICATION FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE

Pursuant to the provisions of 10 C.F.R. Section 2.790 (b)(1), The Dow Chemical Company hereby requests that the accompanying document (and the contents thereof), consisting of a letter from Francis P. Frauson to R. McFedries, dated January 11, 1979, be withheld from public disclosure.

It is considered that this document contains proprietary data, trade secrets and confidential information of The Dow Chemical Company pursuant to 10 C.F.R. 9.5(a)(4) of the NRC's regulations.

Applicant hereby presents an affidavit pursuant to 10 C.F.R. 2.790(b)(1) which supports such request.

When the need for use of the information contained in such document no longer exists, it is respectfully requested that the document be returned to Dow.

Respectfully submitted,

Bruce M Kanuch

Bruce M. Kanuch
Managing Counsel

BMK/dd
Encl.

AFFIDAVIT

STATE OF MICHIGAN)
) ss.
County of Midland)

ROBERT McFEDRIES, duly sworn, deposes and says:

1. THAT he is the Director of Research and Development for the Functional Products and Systems Department of The Dow Chemical Company;

2. THAT the Nuclear Services Group, a business group within the Functional Products and Systems Department, falls within his area of responsibility;

3. THAT he is responsible for identifying confidential and trade secret information in the field of cleaning steam generators associated with nuclear power plants which the Nuclear Services Group commercially exploits;

4. THAT the information set forth in the letter from Francis P. Frauson to myself enclosed in the attached envelope marked Trade Secrets of The Dow Chemical Company, which he has read, has been identified by Dow as proprietary and confidential and constitutes trade secrets in accordance with procedures at least as stringent as Dow's normal procedure with respect to such identification;

5. THAT this information has been treated as a trade secret by Dow and has not been made available to the public;

6. THAT in instances where any portion of such information has been disclosed or made available to others outside Dow it has been done so only under the terms of a written secrecy and/or non-analysis agreement requiring the recipient to not disclose, divulge, analyze or otherwise use said information;

7. THAT the maintenance of the trade secret status of this information is vital to the competitive advantage which Dow now possesses in this field. Dow does not know of any competitive process or chemicals which are capable of achieving the results achieved by using the Dow Trade Secret information; nor of any other product which has been subjected to such a battery of verification testing;

8. THAT making this information available to the public would cause Dow substantial harm since competitors would be able to use the information without incurring the substantial research and development expense incurred by Dow in developing the information and perfecting its use;

9. THAT the Trade Secrets cannot, in my opinion, be readily duplicated by independent research.

Further Affiant sayeth not.

Robert McFedries

Sworn to and subscribed before me this 29th day of January, 1979.

Nina S. Mohlmann
Notary Public

NINA S. MOHLMANN
Notary Public, Midland County, Michigan
My Commission Expires October 6, 1981

DOW CHEMICAL U.S.A.

LARKIN LABORATORY
1691 N. SWEDE RD.
MIDLAND, MICHIGAN 48640

January 11, 1979

R. McFedries
Director of Research and Development
Functional Products and Systems

STEAM GENERATOR CLEANING PROCESS SOLVENT FORMULATION - DOW TRADE SECRET

The steam generator cleaning research program has led to the development of four chemical solutions which will be utilized in the cleaning process. The chemical dissolution of iron oxide deposits will be accomplished utilizing a chemical formulation know as NS-5 which contains ammonium hydroxide, ammonium sulfate, citric acid, corrosion inhibitor NI-100, deionized water, diethylenetriaminepentaacetic acid, ethylenediaminetetraacetic acid, hydrazine, and sodium pyrophosphate. The chemical dissolution of copper and copper oxide deposits will be accomplished utilizing a chemical formulation known as NC-300 which contains ammonium bicarbonate, ammonium hydroxide, ammonium persulfate, and deionized water. A chemical rinse known as NR-100 which contains ammonium hydroxide, deionized water, and ethylenediaminetetraacetic acid will be utilized between alternating NS-5 and NC-300 stages. The steel surfaces will be passivated using an aqueous solution containing a chemical formulation known as NP-100 which contains disodium phosphate, monosodium phosphate, and sodium nitrite.

These four formulations are considered Dow trade secrets and as such will not be disclosed outside The Dow Chemical Company except after the execution of a confidentiality agreement acceptable to Dow by the outside party.

Sincerely,

Francis P. Frauson, Jr.
Research Specialist
Decontamination Systems R&D

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