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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244  
 AUTH. NAME: WHITE, L. D. AUTHOR AFFILIATION: Rochester Gas & Electric Corp.  
 RECIP. NAME: ZIEMANN, D. L. RECIPIENT AFFILIATION: Operating Reactors Branch 2

SUBJECT: Explains reasons for requesting that portions of info supplied in response to NRC to undervoltage protection questions be withheld from public disclosure. Matl contains confidential trade secrets & commercial info.

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ASSOCIATION FOR THE REGULATION OF THE...  
REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649



LEON D. WHITE, JR.  
VICE PRESIDENT

TELEPHONE  
AREA CODE 716 546-2700

September 27, 1979

Director of Nuclear Reactor Regulation  
ATTN: Mr. Dennis L. Ziemann, Chief  
Operating Reactors Branch No. 2  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Undervoltage Protection  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Ziemann:

In our letter dated July 31, 1979 we responded to questions regarding undervoltage protection for Ginna. We requested that a portion of the information supplied with our letter, specifically Figure 1 and Enclosure A, be withheld from public disclosure pursuant to Section 2.790 of the Commission's Rules of Practice and Part 9.5 of the Commission's Regulations. In response to a request from a member of your Staff, this letter elaborates on our reasons for requesting that the subject information be treated as proprietary and withheld from public disclosure. This letter is submitted by affidavit.

The material is proprietary as it contains trade secrets and commercial information held in confidence by us as its owner; is information of the type customarily held in confidence by us due to its unique nature; is not generally available in public sources; and the public disclosure of which could cause substantial harm to the competitive position of Rochester Gas and Electric in that it has high commercial value developed with substantial expenditures of effort and money by us which could not be easily duplicated by others. Specifically, a methodology was developed which permits a quantitative ongoing review and assessment of safety system integrity. This represents a unique design approach which is not utilized by others. Use of this methodology without the permission of the owners and without compensation to the owners could damage the relative position of the owner in providing services.

Very truly yours,

*L. D. White, Jr.*  
L. D. White, Jr.

Subscribed and sworn to me  
on this <sup>27th</sup> day of September 1979

*Gary L. Reiss*

GARY L. REISS  
NOTARY PUBLIC, State of N. Y. Monroe Co.  
My Commission Expires March 30, 1981

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