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 FACIL: 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 COPELAND, R.A. Exxon Nuclear Co., Inc. (subs. of Exxon Corp.)
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards proprietary XN-NF-85-64(P), "Plant Transient Analysis for DC Cook Unit 2 W/10% Steam Generator Tube Plugging." Rept withheld (ref 10CFR2.790(h)).

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EXXON NUCLEAR COMPANY, INC.

2101 HORN RAPIDS ROAD, PO BOX 130, RICHLAND, WA 99352
(509) 375-8100 TELEX: 15-2878

November 15, 1985
RAC:070:85

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License No. DPR-74
TRANSMITTAL OF
PLANT TRANSIENT ANALYSES RESULTS
IN SUPPORT OF UNIT 2 OPERATION

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

References: XN-NF-85-64(P), "Plant Transient Analysis for D. C. Cook
Unit 2 with 10% Steam Generator Tube Plugging," Exxon Nuclear
Company, October 1985.

Dear Mr. Denton:

Enclosed are five copies of the reference Exxon Nuclear Company
technical report which supports operation of the D. C. Cook Unit 2 nuclear
plant. At the request of American Electric Power Service Company (AEPSC),
this report is being transmitted directly by Exxon Nuclear.

Exxon Nuclear considers the reference topical report to be proprietary.
Enclosed, also, is an affidavit executed by Mr. G. N. Ward of Exxon Nuclear
needed to support the withholding of the reference topical report from public
disclosure as required by the Commission's regulation 10 CFR 2-790(h).

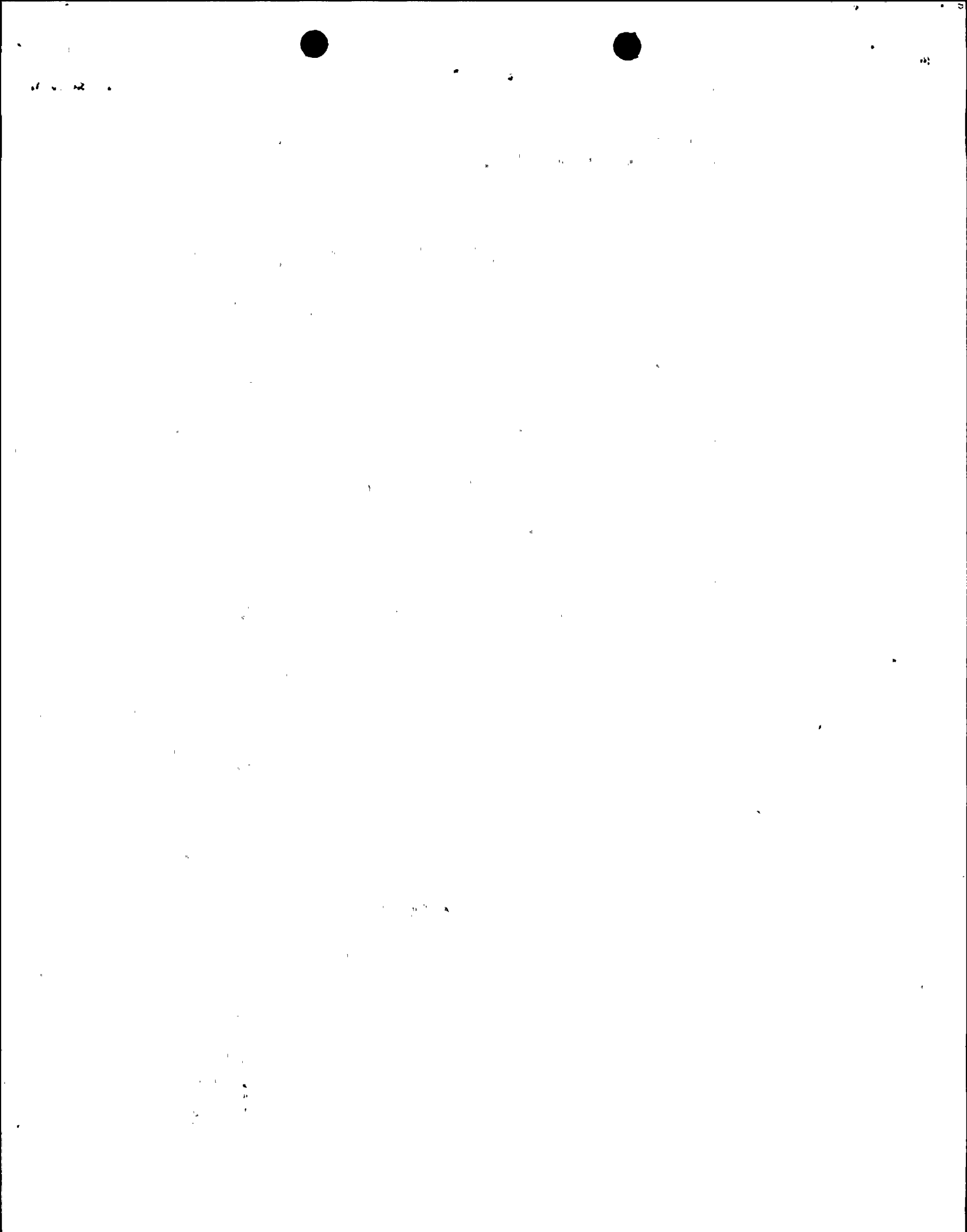
If you have any questions regarding this transmittal, please contact
Mr. James G. Feinstein of AEPSC at (614) 233-2040.

Sincerely,

R. A. Copeland
Reload Licensing

cc: Mr. D. L. Wigginton (NRC) (w/att) Airborne
Mr. N. Lauben (NRC) (w/att) Airborne
Mr. M. P. Alexich (AEPSC)

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A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, G. N. Ward being duly sworn, hereby say and depose:

1. I am Manager, Reload Licensing Liaison for Exxon Nuclear Company, Inc. ("ENC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with ENC's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the document XN-NF-85-64(P) entitled "Plant Transient Analysis for D. C. Cook Unit 2 with 10 referred to as "Document." Information contained in this Document has been classified by ENC as proprietary in accordance with the control system and policies established by ENC 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 ENC 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 ENC and would be helpful to competitors of ENC when competing with ENC.

7. The information contained in the Document is considered to be proprietary by ENC because it reveals certain distinguishing aspects of the Exxon Nuclear plant transient methodology which secure competitive advantage to ENC for fuel design optimization and marketability, and includes information utilized by ENC in its business which affords ENC 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 the Exxon Nuclear plant transient methodology and would result in substantial harm to the competitive position of ENC.

9. The Document contains proprietary information which is held in confidence by ENC and is not available in public sources.

10. In accordance with ENC'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 ENC only as required and under suitable agreement providing for non-disclosure and limited use of the information.

11. ENC 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 the Exxon Nuclear plant transient methodology developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the the Exxon Nuclear plant transient methodology revealed in the Document. Assuming a competitor had available the same background data and incentives as ENC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ENC.

13. Based on my experience in the industry, I do not believe that the background data and incentives of ENC's competitors are sufficiently similar to the corresponding background data and incentives of ENC to reasonably expect such competitors would be in a position to duplicate ENC's proprietary information contained in the Document.



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THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.

[Handwritten signature]

SWORN TO AND SUBSCRIBED

before me this 15th day of

November, 1985.

[Handwritten signature: Florio R. Fitzgerald]
NOTARY PUBLIC
OF CALIFORNIA

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