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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-85-68(P), "DC Cook Unit 2
 Limiting Break LOCA/ECCS Analysis, 10% Steam Generator Tube
 Plugging & K(Z) Curve." Affidavit encl. Rept withheld (ref
 10CFRZ.790).

SEE SUBJECT FILES FOR ENCLOSURE

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MEMORANDUM FOR THE SECRETARY OF DEFENSE
 SUBJECT: [Illegible]

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EXXON NUCLEAR COMPANY, Inc.

2101 Horn Rapids Road
P. O. Box 130, Richland, Washington 99352
Phone: (509) 375-8100 Telex: 15-2878

October 3, 1985
RAC:067:85

Donald C. Cook Nuclear Plant Unit No. 2
Docket No. 50-316
License No. DPR-74
TRANSMITTAL OF
LOCA-ECCS ANALYSIS
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

Reference: XN-NF-85-68(P), "Donald C. Cook Unit 2 Limiting Break LOCA/ECCS Analysis, 10% Steam Generator Tube Plugging and K(z) Curve," Exxon Nuclear Company, September 1985.

Dear Mr. Denton:

Enclosed are five copies of the Exxon Nuclear Company technical report XN-NF-85-68(P), entitled "Donald C. Cook Unit 2 Limiting Break LOCA/ECCS Analysis, 10% Steam Generator Tube Plugging and K(z) Curve," 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 Company considers information contained in the enclosed technical report to be proprietary. In accordance with the Commission's Regulation 10 CFR 2.790(b), the enclosed Affidavit executed by Mr. H.E. Williamson of Exxon Nuclear provides the necessary information to support the withholding of the enclosed technical report from public disclosure.

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

Sincerely,

R.A. Copeland

R. A. Copeland
PWR Reload Licensing

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PDR ADDCK 05000316 PDR

naa

cc: Mr. D.L. Wigginton (NRC) (w/att.)
Mr. J. Guttman (NRC) (w/att.)
Mr. M.P. Alexich (AEPSC)

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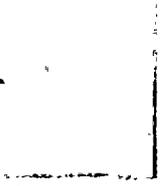
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A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, H. E. Williamson being duly sworn, hereby say and
depose:

1. I am Manager, Licensing and Safety Engineering, 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-85-68(P) entitled
"Donald C. Cook Unit 2 Limiting Break LOCA/ECCS Analysis, 10% Steam
Generator Tube Plugging and K(z) Curve" 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 LOCA/ECCS 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 LOCA/ECCS 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 LOCA/ECCS 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 LOCA/ECCS 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.

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

FURTHER AFFIANT SAYETH NOT.

A. E. Williamson

SWORN TO AND SUBSCRIBED

before me this 2nd day of

October, 1985.

Gloria R. Fitzgerald

NOTARY PUBLIC

