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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 AUTH. NAME: CHANDLER, J. C. AUTHOR AFFILIATION: Exxon Nuclear Co., Inc. (subs. of Exxon Corp.)
 RECIP. NAME: DENTON, H. R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards XN-NF-83-61, "DC Cook Unit 1 LOCA-ECCS Analysis for Extended Exposure" & proprietary XN-NF-84-25(P), "Mechanical Design Rept Suppl for DC Cook Unit 1 Extended Burnup Fuel Assemblies." Proprietary rept withheld.

-XN-NF-83-61

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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

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PDR

August 21, 1984
JCC:113:84

Donald C. Cook Nuclear Plant Unit No. 1
Docket No. 50-315
License No. DPR-58
MECHANICAL DESIGN AND LOCA-ECCS ANALYSES
SUPPORTING HIGH BURNUP OPERATION OF FUEL
FABRICATED BY EXXON NUCLEAR

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

Dear Mr. Denton:

Enclosed for your use are fifteen copies of the following technical reports issued by Exxon Nuclear Company:

XN-NF-84-25(P), "Mechanical Design Report Supplement for D.C. Cook Unit 1; Extended Burnup Fuel Assemblies," dated April 1984.

XN-NF-83-61, "D.C. Cook Unit 1 LOCA-ECCS Analysis for Extended Exposure," dated August 1983.

At the request of American Electric Power Service Company (AEPSC), these documents are being transmitted directly by Exxon Nuclear. These reports have been reviewed by AEPSC and will be referenced in subsequent docket action.

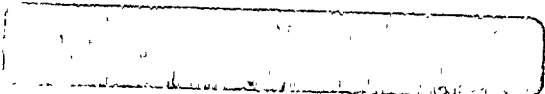
Exxon Nuclear Company considers information contained in XN-NF-84-25(P), to be proprietary. In accordance with the Commission's Regulation 10 CFR 2.790(b), the enclosed Affidavit executed by our Dr. R.B. Stout provides the necessary information to support the withholding of this document from public disclosure. The non-proprietary version of XN-NF-84-25 will be forwarded separately.

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

Sincerely,



J.C. Chandler, Lead Engineer
Reload Fuel Licensing



JCC:naa

cc: Mr. D.L. Wigginton (NRC)
Mr. M.P. Alexich (AEPSC)

Two Rids

*1007 - XN-NF-84-25(P)
/14*

*1010 - XN-NF-83-61
/14*

A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, Richard B. Stout, 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-84-25(P), entitled "Mechanical Design Report Supplement for D.C. Cook Unit 1 Extended Burnup Fuel Assemblies," 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.

On [Date], [Location], [Name]

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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 fuel mechanical design analysis methods and results 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 fuel mechanical design analysis methods and results and would result in substantial harm to the competitive position of ENC.

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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 fuel mechanical design analysis methods and results developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the fuel mechanical design analysis methods and results 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.

Richard B. Stone

SWORN TO AND SUBSCRIBED

before me this 21 day of

August, 1984.

Susan L. Backus

NOTARY PUBLIC

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COUNTY OF [illegible]
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