

fracture proof design corporation

October 2, 1984

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Application for Withholding From Public Disclosure

Gentlemen:

We are transmitting herewith, five (5) copies of a report entitled "Evaluation of the Toughness of Irradiated Welds at 200C and 288C for the Turkey Point Unit 4 Beltline Weld" (PROPRIETARY), FPDC Report 83-185, Rev. 1, September 9, 1984. Pursuant to 10CFR 2.790, as amended, of the Rules and Regulations of the Commission, we hereby request that the information contained in the report be withheld from public disclosure for the following reasons.

1. The methodology used to perform the analysis in the subject report was developed solely at the expense of Fracture Proof Design Corporation (FPDC).
2. The methods of analysis used are proprietary to FPDC and have not been disclosed to the public or Florida Power and Light Company except for those persons who have complied with Paragraph 4 below.
3. The development of certain of the methods of analysis involving the techniques used in this report are not published elsewhere in the literature.
4. Any person who has access to this information, including employees of FPDC, has signed agreements of non-disclosure and confidential treatment of said proprietary information.
5. FPDC is presently in a very strong competitive position because of its exclusive knowledge of these methods of analysis and disclosure of information in the subject report would irreparably damage the competitive position of FPDC.
6. Florida Power and Light Company has not paid fees equivalent to the cost of development of the technology used in preparation of the subject report. The total fees received for the analysis represent less than ten percent of the value, to FPDC, of the methodology.
7. One (1) copy of the report has been given to a Florida Power and Light Company employee who has complied with Paragraph 4 above.

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October 2, 1984
Page 2

Please address any questions regarding this matter to Keyren
H. Cotter, President, FPDC at the above address.

Sincerely,

FRACTURE PROOF DESIGN CORPORATION



Keyren H. Cotter, President

KHC:plo
Enclosures

fracture proof design corporation

STATE OF MISSOURI)
)
CITY OF ST. LOUIS)

AFFIDAVIT

Keyren H. Cotter, being duly sworn, deposes and says the following:

1. Fracture Proof Design Corporation ("FPDC") is a duly organized and existing corporation under the laws of the State of Missouri.
2. He is the president of FPDC, and he has executed this Application for Withholding From Public Disclosure and this Affidavit with the approval and authority of FPDC.
3. A certain report entitled "Evaluation of the Toughness of Irradiated Welds at 200C and 288C for the Turkey Point Unit 4 Beltline Weld" (PROPRIETARY), FPDC Report 83-185, Rev. 1, September 9, 1984, submitted, together with this Affidavit and Application for Withholding From Public Disclosure, is the sole and exclusive property of FPDC.
4. The methodology used to perform the analysis in the subject report was developed solely at the expense of FPDC.
5. The methods of analysis used are proprietary to FPDC and have not been disclosed to the public, or to the Florida Power and Light Company except as provided in Paragraph 7 below.
6. The development of certain of the methods of analysis involving the techniques used in this report are not published elsewhere in the literature.
7. Any person who has access to this information, including employees of FPDC, have signed agreements of non-disclosure and confidential treatment of said proprietary information.
8. FPDC is presently in a very strong competitive position because of its exclusive knowledge of these methods of analysis and disclosure of information in the subject report would irreparably damage the competitive position of FPDC.
9. Florida Power and Light Company has not paid fees equivalent to the cost of development of technology used in preparation of the subject report. The total fees received for the analysis represent less than ten percent of the value, to FPDC, of the methodology.

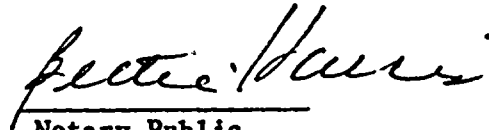
10. One (1) copy of the report has been given to a Florida Power and Light Company's employee who has complied with the provisions of Paragraph 7 above.

Affiant further states that the foregoing statements are true and accurate to the best of his knowledge and belief, and he hereby acknowledges that he has executed this Affidavit as his own free act and deed.



Keyren H. Cotter

Subscribed and sworn to before me this 2nd day of October, 1984.



Bettie Harris
Notary Public

My Commission Expires:

BETTIE HARRIS
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES 8/17/88
ST. LOUIS COUNTY

15