

EXXON NUCLEAR COMPANY, Inc.

2101 Horn Rapids Road
P. O. Box 130, Richland, Washington 99352
Phone: (509) 943 8100 Telex: 32-6353

July 5, 1979

Mr. L. E. Phillips
Analysis Branch
Division of System Safety
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Exxon Nuclear Company's XN-3 Correlation for
Predicting Thermal Margin

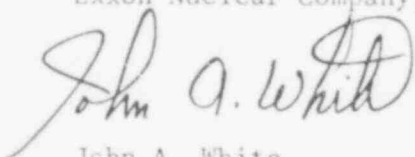
Dear Mr. Phillips:

Attached please find responses to concerns raised during the meeting held between Exxon Nuclear Company and the Nuclear Regulatory Commission on March 12, 1979. The meeting centered on outlining ENC's procedure for calculating minimum critical power ratio (MCPR) and summarizing the data base for the CHF correlation.

The attached material is considered proprietary to ENC. A duly executed affidavit is also attached in accordance with 10 CFR 2.790 (b)(1)(ii). This affidavit describes the basis for the request for exemption from public disclosure.

Sincerely,

Exxon Nuclear Company, Inc.



John A. White
Reload Licensing

JAW:sir

- bcc: KP Galbraith
- CE Leach
- TL Krysinski
- WS Nechodom
- GF Owsley
- TW Patten
- GA Sofer
- JAW File/LB

478
 267
 X 6501
 1/1
 PROP ENCL TO
 ADDRESSEE
 ADD:
 M RUSHBROOK
 LTR & AFF

7907110 454

A F F I D A V I T

STATE OF Washington

)

COUNTY OF Benton

) ss.

I, Roy Nilson, being duly sworn, hereby say and depose:

1. I am Manager, Licensing, 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 attachment, entitled "Responses to Concerns Raised at ENC/NRC Meeting Held March 12, 1979", referred to as "Attachment", which is being submitted by Exxon Nuclear Company. Information contained in this Attachment 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 Attachment 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 Attachment as being proprietary and confidential.

5. The Attachment has been made available to the United States Nuclear Regulatory Commission in confidence, with the request that the information contained in the Attachment not be disclosed or divulged.

~~478~~ 267
478

6. The Attachment 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 Attachment is considered to be proprietary by ENC because it reveals certain distinguishing aspects of thermal-hydraulic test data and design analysis results which secure competitive economic advantage to ENC by design optimization and improved 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 Attachment.

8. The disclosure of the proprietary information contained in the Attachment 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 ENC's modeling techniques and fuel design test data and would result in substantial harm to the competitive position of ENC.

9. The Attachment 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 Attachment 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. Checks are made routinely to assure the policy procedures are being met.

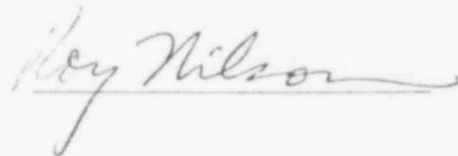
481 268
478

12. This Attachment provides information which reveals modeling techniques and fuel design data developed by ENC over the past several years. ENC has invested several hundred thousand dollars and many man-years of effort in the related data and modeling development, and fuel design efforts. Assuming a competitor had available the same background data and incentives as ENC, the competitor might, at a minimum cost, 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 that it is reasonable to expect such competitors would be in a position to duplicate ENC's proprietary information contained in the Attachment.

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

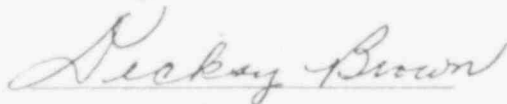
FURTHER AFFIANT SAYETH NOT.



SWORN TO AND SUBSCRIBED

before me this 5th day of

July, 1979.



NOTARY PUBLIC