

Donald J. Broehl Assistant Vice President

August 13, 1979

Trojan Nuclear Plant
Docket 50-344
License NPF-1

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

Dear Sir:

As requested by your letter dated June 29, 1979 and subsequent clarification provided in Walter P. Hass' letter of July 24, 1979, enclosed are 40 copies of the results of the Management and Technical Resources Survey of Portland General Electric Company and the Trojan Nuclear Plant. Our letter of July 26, 1979 had requested a 2-week extension for submittal of this material.

Also enclosed is an affidavit which establishes the confidential nature of the information and explains the reasons for withholding it from public disclosure. PGE hereby requests that Attachments 1 through 6 of the enclosed submittal be withheld from public disclosure pursuant to 10 CFR 2.790 on the grounds that the information therein constitutes confidential personnel and commercial information.

If you have any questions in regard to this material, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Donald J. Broehl', is written in dark ink.

c: Mr. Lynn Frank, Director w/nonproprietary encl
State of Oregon
Department of Energy

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
PORTLAND GENERAL ELECTRIC COMPANY,) Docket 50-344
et al)
)
(Trojan Nuclear Plant))

AFFIDAVIT OF DONALD J. BROEHL
RE PROPRIETARY INFORMATION

STATE OF OREGON)
) ss.
County of Multnomah)

DONALD J. BROEHL, being first duly sworn on oath deposes and says:

1. I am the Assistant Vice President for Engineering-Construction for Portland General Electric Company (Company). My business address is 121 S.W. Salmon Street, Portland, Oregon 97204. My responsibilities include the review of responses to requests for information from the NRC Staff.
2. The NRC Staff has requested each licensee of an operating nuclear plant to submit a large volume of detailed background information concerning that Company's engineering and management personnel resources. By considerable effort, the Company has developed this information which in form will essentially consist of personal resume's of all engineering personnel and all important management personnel. While the information submitted does not include the names of the persons whose qualifications are being provided, the Company believes such identification would be a relatively easy matter since each person's title is being provided.

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3. The Company believes that the disclosure of such personnel information would constitute a clearly unwarranted invasion of personal privacy for the following reasons:

(a) The information was submitted by the affected employees in confidence and has been held by the Company in confidence.

(b) The information is of the type generally held in confidence by the recipient unless the employee providing the information has given instructions otherwise.

(c) Such information is not available from public sources, and generally could not be properly acquired by others without the employee's consent.

4. In addition to the employee's interest in nondisclosure, the Company urges that it itself has a legitimate interest in the nondisclosure of such confidential commercial information for the following reasons:

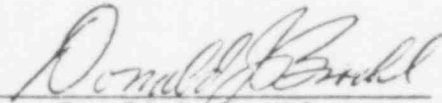
(a) The information being submitted has been held in confidence by the Company.

(b) Such employee background information is not available from public sources and hence would be difficult for others to compile without the employee's knowledge and consent.

(c) Employee background information is customarily held in confidence by the employer both to protect the employee from harrassment by others who might seek the employee's services and

to protect the employer from losing its valuable employees. By its request for this kind of information, the NRC Staff has implicitly recognized the importance of the information sought in terms of evaluating an employee's qualifications.

- (d) The Company believes that public disclosure of background information of this type about its valuable employees would cause substantial harm to its competitive position.
- (e) This information has not been previously transmitted or supplied to the NRC and, under the provisions of 10 CFR 2.790, is to be received by the Commission in confidence.



Donald J. Broehl

SUBSCRIBED AND SWORN to before me this 13th day of August, 1979.



Notary Public for Oregon

My Commission Expires:

August 9, 1983