

**EXXON NUCLEAR COMPANY, Inc.**

2101 Horn Rapids Road  
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Phone: (509) 375-8100 Telex: 15-2878

April 15, 1980

GFO:080:80

Mr. T. A. Ippolito, Chief  
Operating Reactors Branch #3  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Ippolito:

Enclosed are twenty-five (25) copies of ENC's response to the request for additional information by your letter of January 25, 1980 in regard to report XN-NF-79-6(P), "Exxon Nuclear Analysis of Power Distribution Measurement Uncertainty for Westinghouse PWRs."

Exxon Nuclear Company considers the information contained in the report XN-NF-79-6(P), Amendment 1, to be proprietary. In accordance with the Commission's Regulation 10CFR2.790(b), the attached Affidavit executed by our Mr. J. N. Morgan provides the necessary information to support the withholding of the subject responses from public disclosure.

Twenty (20) copies of the non-proprietary version of the responses are also enclosed.

Please contact me if you have further questions regarding this matter.

Sincerely,

*G. F. Owsley*  
G. F. Owsley, Manager  
Reload Fuel Licensing

GFO:gf  
Enclosures  
As noted

CC: Mr. L. I. Kopp (USNRC)

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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 reactor core modeling and statistical techniques which secure competitive economic advantage to ENC for fuel management and safety analysis 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 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 ENC's reactor core modeling, statistical techniques and fuel management procedures 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. Checks are made routinely to assure the policy procedures are being met.

12. This Document provides information which reveals reactor core modeling and statistical methods developed by ENC over the past several years. ENC has invested several hundred thousand dollars and many man-years of effort in related core modeling and statistical technique development. 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.

James H. Morgan

SWORN TO AND SUBSCRIBED

before me this 11<sup>th</sup> day of

April, 1980.

Dickey Brown  
NOTARY PUBLIC