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Docket No. STN 50-482

Mr. J. M. Komes, Vice President  
Bechtel Power Corporation  
15740 Shady Grove Road  
Gaithersburg, Maryland 20760

Dear Mr. Komes:

SUBJECT: REQUEST FOR WITHHOLDING MATERIAL FROM PUBLIC DISCLOSURE - COMPUTER  
CODE VERIFICATION INFORMATION - WOLF CREEK BASE MAT REANALYSIS

Your letter, dated June 6, 1979, transmitted material on the computer code verification information for the Wolf Creek Base Mat Reanalysis and requested that it be withheld from public disclosure pursuant to 10 CFR 2.790. By letter, dated February 20, 1980, we received your affidavit justifying the above stated information as confidential and proprietary.

Your reason for requesting our withholding this information was that it would cause substantial harm to the competitive status of the Bechtel Power Corporation. The documents requested to be withheld consist of (a) Bechtel Structural Analysis Program (BSAP) Verification Report, (b) BSAP User's Manual, and (c) BSAP Theoretical Manual, Volumes 1 and 2. The documents were developed in connection with the BSAP Computer Program which is a major Bechtel computer code used throughout the Bechtel Power Corporation for structural analysis. The program has proven to be cost-effective, and a savings of up to two-thirds over programs in the public domain have been realized. This savings represents a competitive advantage which Bechtel has sought to protect. Over the past several years, Bechtel has invested a great deal of resources in developing, maintaining and verifying the BSAP information. In your affidavit, you stated that to the best of your knowledge and belief, the documents stated above have been withheld in confidence and no public disclosure of them has been made. Public disclosure of these documents would cause substantial competitive harm to Bechtel by reducing the competitors' costs of duplicating and then verifying the program.

We have reviewed your application and material based on the requirements and criteria of 10 CFR 2.790 and have determined that the above-mentioned documents sought to be withheld contain trade secrets or confidential and proprietary commercial information.

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We also have found at this time that the right of the public to be fully apprised as to the bases for and effects of the proposed action does not outweigh the demonstrated concern for protection of your competitive position. Accordingly, we have determined that the information should be withheld from public disclosure.

We therefore approve your request for withholding pursuant to Section 2.790 of 10 CFR Part 2 and are withholding the Bechtel Structural Analysis Program Information from public inspection as proprietary.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, assure that the consultants have signed the appropriate agreements for handling proprietary data.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC.

Sincerely,

Critically Signed by  
O. D. Parr

Olan D. Parr, Chief  
Light Water Reactors Branch No. 3  
Division of Project Management

cc: Mr. Glenn L. Koester  
Vice President - Operations  
Kansas Gas & Electric Company  
201 North Market Street  
Wichita, Kansas 67201

Dale E. Huffman, Esq.  
Bechtel Power Corporation  
15740 Shady Grove Road  
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