## EXON NUCLEAR COMPANY, Inc.

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November 5, 1980

GFO:149:80

Mr. James R. Miller, Chief Standardization & Special Projects Branch Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

SUBJECT:

XN-NF-79-71(P), Supplement 1, "Exxon Nuclear Company's Plant Transient Simulator Code for the Evaluation of Abnormal Transients for Jet-Pump Boiling Water Reactors," October 1980

- References: 1) XN-NF-79-71(P), Revision 1, "Exxon Nuclear Company's Plant Transient Simulator Code for the Evaluation of Abnormal Transients for Jet-Pump Boiling Water Reactors," May 1980
  - 2) XN-NF-80-19(P), Volume 1, "Exxon Nuclear Company's Plant Transient Simulator Code for the Evaluation of Abnormal Transients for Jet-Pump Boiling Water Reactors," May 1980

Dear Mr. Miller:

Enclosed are forty (40) copies of the subject Exxon Nuclear topical report for your review and approval. This report supplements the Reference 1 report transmitted to you in May 1980. The subject report describes the integration of the PTSBWR3 plant transient simulation model, described in Reference 1, with ENC's detailed model for core kinetics and thermal hydraulics, COTRAN, described in Reference 2. This integrated model is called COTRANSA. The COTRANSA model will be used by Exxon Nuclear in conjunction with the less complicated PTSBWR3 model in performing plant transient analyses for jet pump BWRs.

Exxon Nuclear Company considers the information contained in this document to be proprietary. In accordance with the Commission's Regulation 10 CFR 2.790(b), the enclosed Affidavit executed by our Mr. James N. Morgan provides the necessary information to support the withholding of this report from public disclosure.

Twenty (20) copies of the non-proprietary version of this document will be transmitted in the near future. Please contact me if you have any questions or comments.

> G. F. Owsley, Manager Reload Fuel Licensing

GFO:gf Enclosures As noted

CC: Mr. T. P. Speis (USNRC) Mr. W. V. Johnston (USNRC)

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## AFFIDAVIT

STATE OF Washington
)
COUNTY OF Benton
) ss.

- I, James N. Morgan, being duly sworn, hereby say and depose:
- I am Manager, Licensing and Safety Engineering, 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 report XN-NF-79-71(P), Supplement 1, entitled "Exxon Nuclear Company's Plant Transient Simulator Code for the Evaluation of Abnormal Transients for Jet-Pump Boiling Water Reactors," referred to as "Document". Information contained in this Document 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 Document 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 Document as being proprietary and confidential.
- 5. The Document has been made available to the United States Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document not be disclosed or divulged.

- 2 -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 consi red to be proprietary by ENC because it reveals certain distinguishing aspects of safety analyses methods which secure competitive economic advantage to ENC for 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 safety evaluation methods and would result in substantial harm to the competitive position of ENC. 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 nondisclosure and limited use of the informatic 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 safety analysis methods developed by ENC over the past several years. ENC has invested hundreds of thousands of dollars and several man-years of effort in developing the safety analysis methods revealed in the Document.

  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.

Jamosh hagan

SWORN TO AND SUBSCRIBED

before me this \_ day of

now, 1980.

Susan & Backus