

**EXXON NUCLEAR COMPANY, Inc.**

2101 Horn Rapids Road

P. O. Box 130, Richland, Washington 99352

Phone: (509) 375-8100 Telex: 15-2878

June 23, 1981

GFO:052:81



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

SUBJECT: XN-NF-80-19(P), Volume 1, Supp. 2, "Exxon Nuclear  
Methodology for Boiling Water Reactors; Neutronics  
Methods for Design and Analysis," May 1981

Dear Mr. Miller:

This letter transmits twenty-five (25) copies of the subject  
topical report.

Exxon Nuclear Company considers the information contained in  
this report 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 the subject document from public disclosure.

The non-proprietary version of this report will be transmitted  
under separate cover.

Sincerely,

A handwritten signature in cursive script that reads "G. F. Owsley".

G. F. Owsley, Manager  
Reload Fuel Licensing

GFO:gf  
Enclosures  
As noted

CC: Mr. J. S. Berggren (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 neutronic design and analysis methods which secure competitive economic advantage to ENC for fuel 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 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 fuel design and analysis methods, 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.

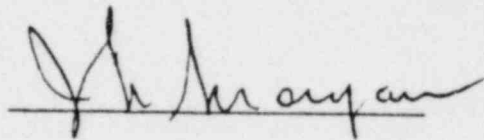
11. ENC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis. Checks are made routinely to assure the policy procedures are being met.

12. This Document provides information which reveals neutronic design and 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 neutronic design and analytical 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.



SWORN TO AND SUBSCRIBED

before me this 22 day of

June, 1981.

Susan E. Backus  
NOTARY PUBLIC