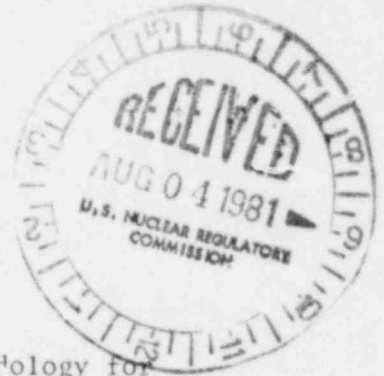


EXXON NUCLEAR COMPANY, Inc.

2101 Horn Rapids Road
P. O. Box 130, Richland, Washington 99352
Phone: (509) 375-8100 Telex: 15-2878

July 31, 1981
JCC:027:81



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

SUBJECT: XN-NF-80-19(P), Volume 2C, "Exxon Nuclear Methodology for Boiling Water Reactors - Verification and Qualification of EXEM," dated June 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,
J.C. Chandler
J. C. Chandler
Reload Fuel Licensing

JCC:gf
Enclosures
As noted

CC: Mr. J. S. Berggren (USNRC)

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A F F I D A V I T

STATE OF Washington)
))
COUNTY OF Benton)) ss.

I, James N. Morgan, being duly sworn, hereby say and depose:

1. I am Manager, Fuel Licensing, 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-80-19(P), Volume 2C, "Exxon Nuclear Methodology for Boiling Water Reactors - Verification and Qualification of EXEM," 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.

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 ECCS 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 ECCS 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 area made routinely to assure the policy procedures are being met.

12. This Document provides information which reveals ECCS 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 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.

James H. Morgan

SWORN TO AND SUBSCRIBED

before me this 30 day of

July, 1981.

Susan E. Backus
NOTARY PUBLIC