

**EXXON NUCLEAR COMPANY, Inc.**

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June 23, 1983

RAC:025:83

Dr. Cecil O. Thomas, Acting Branch Chief  
Standardization & Special Projects Branch  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

Subject: XN-NF-696(P), "ENC's Solution to the NRC Sample Problems - PWR Assemblies Mechanical Response to Seismic and LOCA Events".

Dear Dr. Thomas:

Enclosed for your information and review are twenty-two copies of topical report XN-NF-697(P), "ENC's Solution to the NRC Sample Problems - PWR Assemblies Mechanical Response to Seismic and LOCA Events". This report provides a verification of the technique used by ENC in the mechanical seismic and LOCA response calculations.

Exxon Nuclear Company considers information contained in the subject reports to be proprietary. In accordance with the commission's regulation 10 CFR 2.790(B), the enclosed affidavit executed by our Dr. Richard B. Stout provides the necessary information to support the withholding of the subject document from public disclosure.

If there are any questions, or if I can be of further help, please contact me at (509) 943-5323.

Sincerely,

*Bob Copeland*

R. A. Copeland

cc: Mr. D. H. Moran (NRC)  
Dr. R. O. Meyer (NRC)  
Dr. S.L. Wu (NRC)

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To: Dave Moran*

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A F F I D A V I T

STATE OF Washington )

ss.

COUNTY OF Benton )

I, Richard B. Stout, being duly sworn, hereby say and depose:

1. I am Manager, Licensing & 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 documents XN-NF-696(P), entitled "ENC's Solution to the NRC Sample Problems: PWR Assemblies Mechanical Response to Seismic and LOCA Events", referred to as "Documents". Information contained in these Documents 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 Documents contain 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 Documents contain information which is vital to a competitive advantage of ENC and would be helpful to competitors of ENC when competing with ENC.

6. The information contained in the Document is considered to be proprietary by ENC because it reveals certain distinguishing aspects of 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 Documents.

7. The disclosure of the proprietary information contained in the Documents 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 nuclear design analysis methods, and would result in substantial harm to the competitive position of ENC.

8. The Documents contain proprietary information which is held in confidence by ENC and is not available in public sources.

9. In accordance with ENC's policies governing the protection and control of information, proprietary information contained in the Documents 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.

10. ENC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

11. These Documents provide information which reveals PWR safety analysis methods developed by ENC over the past several years. ENC has invested hundreds of thousands of dollars and many man-years of effort in developing the analysis methods revealed in the Documents. Assuming a competitor had available the same background data and incentives as ENC, the competitor might, as a minimum, develop the information for the same expenditure of manpower and money as ENC.

12. 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 Documents.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.

Richard J. Bolton

SWORN TO AND SUBSCRIBED

before me this 27 day of

June, 1983.

Susan J. Backus

NOTARY PUBLIC