

EXXON NUCLEAR COMPANY, Inc.

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

November 19, 1981

JCC:042:81



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-79-71(P), Revision 2, "Exxon Nuclear Plant Transient Methodology for Boiling Water Reactors," dated November 1981

Ref.: Letter, J. R. Miller to G. F. Owsley, "Request No. 1 for Additional Information on XN-NF-79-71 (Rev. 1) including Supplements 1 & 2 and Request No. 1 for Additional Information on XN-NF-74-6 (Rev. 4)," dated October 5, 1981

Dear Mr. Miller:

This letter transmits twenty-five (25) copies of the subject report for your review and approval. This report provides responses to the requests for additional information contained in the referenced letter and combines the material in Supplements 1 and 2 with Revision 1 of the subject report.

Exxon Nuclear Company considers information contained in this topical report to be proprietary. In accordance with the Commission's Regulation 10CFR2.790(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.

The non-proprietary version of this report is being transmitted under separate cover. Please contact me if you have further questions or comments regarding this matter, telephone 509-375-8639.

Sincerely,

J. C. Chandler

J. C. Chandler
Reload Fuel Licensing

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Enclosures
As noted

CC: Mr. J. S. Braggren (USNRC)
Mr. R. F. Ludette (USNRC)

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AN AFFILIATE OF EXXON CORPORATION

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 BWR plant transient analytical 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 reactor core operating characteristics, 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.

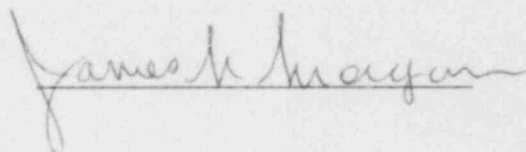
11. ENC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

12. This Document provides information which reveals BWR plant transient analytical 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 and calculating the results 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 NO.



SWORN TO AND SUBSCRIBED

before me this 19 day of

November, 1981.



NOTARY PUBLIC