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June 11, 1982

Mr. James R. Miller, Chief Standardization and Special Projects Branch U. S. Nuclear Regulatory Commission 792 | Norfolk Avenue Betnesda, Maryland 20555

Attn: Mr. Jack Berggren, Project Manager

SUBJECT: TRANSMITTAL OF ATCOR REPORT NO. ATC-8019-1 ENTITLED
(ATCOR LIQUID VOLUME REDUCTION PROCESS TOPICAL REPORT)

Dear Mr. Miller:

Enclosed are twenty-five (25) copies of the proprietary version and fifteen (15) copies of the non-proprietary version of the ATCOR Report No. ATC-8019-1, (ATCOR LIQUID VOLUME REDUCTION PROCESS TOPICAL REPORT) for your review and approval.

The volume reduction process described in this Topical Report can be used as a permanently installed system or as a transportable service. If used as a transportable volume reduction service, the operators would be supplied by Chem-Nuclear Systems, Inc., ATCOR's parent company.

Enclosed is our affidavit in support of the request to withhold the proprietary version of Revision O from public disclosure pursuant to the provisions of Section 2.790 of Title 10, Code of Federal Regulations.

The sections of the report which are considered to be proprietary are listed below:

1) Appendix 1 - Typical Waste Solutions Considered

Appendix 2 - Solidification Agents & Additives
 Appendix 3 - Experimental Basis

4) Appendix 4 - Drawings

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Too8 1/15 shelf Version

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Please feel free to contact me concerning any questions you may have or additional information required for your review.

Sincerely,

ATCOR ENGINEERED SYSTEMS, INC.

Jay A. Blewett Program Manager

JAB:ge 0062A

Encs: Affidavit - 25 copies of Rev. 0 - Proprietary

- 15 copies of Rev. 0 - Non-Proprietary

cc: M. Brownstein R. L. Bangart, Effluent Treatment Systems Branch/NRC C. Marsh - CNSI David Ebenhack, Regulatory Affairs Director/CNSI

AFFIDAVIT SUBMITTED TO NUCLEAR REGULATORY
COMMISSION CONCERNING CONFIDENTIAL INFORMATION
AND TRADE SECRETS CONTAINED IN ATCOR ENGINEERED
SYSTEMS INC., ATCOR LIQUID VOLUME REDUCTION
PROCESS TOPICAL REPORT ATC-8019-1

STATE OF CONNECTICUT)

) SS:
COUNTY OF HARTFORD )

Martin Brownstein states as follows on behalf of ATCOR Engineered Systems, Inc.:

- 1. I am the President of ATCOR Engineered Systems, Inc.
- I have reviewed and am familiar with the contents of Revision O of the report prepared by ATCOR Engineered Systems, Inc. (ATCOR), dated May, 1982 and entitled "Topical Report ATC-8019-1" (hereinafter "the Report".)
- Regulatory Commission. Twenty-five copies of such report contain proprietary information which should be withheld from public disclosure. The other fifteen copies of the Report furnished to the Commission do not contain proprietary information, as trade secret information and privileged commercial data have been removed from these copies so as to make them available for such public disclosure as may be requested.
- 4. ATCOR as part of its radioactive waste disposal services, provides a liquid radioactive waste volume reduction and solidification unit which in many respects is a system unique to ATCOR. Detailed information concerning the design and operation of the system has always been held in confidence by ATCOR. The engineering design for the unit, and the process used in dehydrating and solidifying liquid radioactive waste is considered confidential information that includes Company trade secrets incorporated into such design and processes, which confidential information is deleted from the fifteen copies of the abbreviated Report furnished to the Commission and available for public disclosure.

Employees of ATCOR sign an agreement regarding protection of trade secret information at the time of entering Company employment, and the data contained in the proprietary version of the Report submitted to the Commission contains the type of information ATCOR regards as protected and of the type not to be disclosed to unauthorized persons, including especially competitors, by present or former employees.

5. ATCOR has obtained a competitive edge in the field of liquid radioactive waste volume reduction and solidification because of its extensive experience in the field and financial commitment to

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research, development and design concerning system components and improvements. ATCOR systems, chemical process operating procedures, and process control procedures are presently superior to the equipment used by competitors for similar processes and this superiority is the basis on which system details are being withheld.

The information contained in the proprietary version of the Report is not available from public sources.

- 6. Public disclosure of the proprietary version of the Report would cause substantial harm to the competitive position of ATCOR by negating the years in engineering salaries and capital equipment investment to refine and improve the system. Competitors of ATCOR would have great difficulty in duplicating the system developed by ATCOR, due not only to the financial investment of the company, but also to the unique skills, talents and expertise of ATCOR employees who developed the system which is described in detail in the proprietary version of the Report.
- 7. The right of the public to disclosure of information held by the government is protected by the submission by ATCOR of fifteen copies of the Report with confidential trade secret information ommitted and therefore, the ATCOR competitive position clearly deserves protection, in regard to the twenty-five copies of the Report containing confidential information.

Martin Brownstein,

President

STATE OF CONNECTICUT)

SS:

COUNTY OF HARTFORD )

On this 28th day of May, 1982, before me, a Notary Public in and for the State of Connecticut, duly commissioned and sworn, personally appeared Martin Brownstein, to me known to be the President of ATCOR Engineered Systems, Inc. and on oath stated that he was authorized to make this affidavit on behalf of the corporation.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal the day and year first above written.

NOTARY PUBLIC in and for the State of Connecticut, residing in Harten Count