

EXXON NUCLEAR COMPANY, Inc.

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August 4, 1982

GFO:054:82

Mr. Harold Bernard, Acting Branch 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-75-21(P), Rev. 1, "XCOBRA-IIIC: A Computer Code to Determine the Distribution of Coolant During Steady-State and Transient Core Operation," dated July 1982

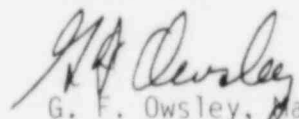
Dear Mr. Bernard:

This letter transmits twenty-five (25) copies of the subject topical report for your information and review. The methodology described in this topical report has been used by the Exxon Nuclear Company for several years. We were informally requested by members of the Core Performance Branch of the NRC to submit this 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.

Please contact me if you have comments or questions regarding this matter.

Sincerely,


G. F. Owsley, Manager
Reload Fuel Licensing

GFO:gf
Enclosures
As noted

CC: Mr. L. E. Phillips (USNRC)

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AN AFFILIATE OF EXXON CORPORATION

A F F I D A V I T

STATE OF Washington)

ss.

COUNTY OF Benton)

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

1. I am Manager, Licensing and 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 document XN-NF-75-21(P), Revision 1, entitled "XCOBRA-IIIC: A Computer Code to Determine the Distribution of Coolant During Steady-State and Transient Core Operation," 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 thermal-hydraulic analysis methodology 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 thermal-hydraulic analysis methodology, 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 thermal-hydraulic analysis methodology developed by ENC. ENC has invested hundreds of thousands of dollars and many man-years of effort in developing the analysis 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 4th day of

August, 19 87.

DeKay Brown
NOTARY PUBLIC