

EXXON NUCLEAR COMPANY, Inc.

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September 29, 1982
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Dr. Cecil O. Thomas, 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-507(P), Supp. 1, "ENC Setpoint Methodology for C.E. Reactors - Statistical Setpoint Methodology," dated September 1982

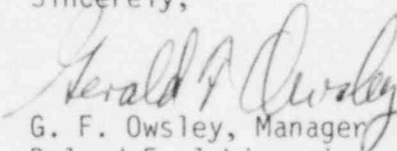
Dear Dr. Thomas:

This letter transmits twenty-five (25) copies of the subject document for your review and approval. This report has been referenced by Florida Power & Light Company for application to Cycle 6 of the St. Lucie Unit 1 reactor. An example application of the setpoint methodology described in the subject report will be provided in a supplement to be submitted in November 1982.

Exxon Nuclear Company considers the information contained in this topical report 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 this requested information from public disclosure.

Please contact me if you have comments or questions regarding this matter, telephone (509) 375-8241.

Sincerely,


G. F. Owsley, Manager
Reload Fuel Licensing

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Enclosures
As noted

CC: Mr. J. Holonich (USNRC)
Mr. Ron Stevens (FP&L)

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 PWR 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 PWR 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.

12. This Document provides information which reveals PWR 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 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.

R. B. Stone 29 Sept 82

SWORN TO AND SUBSCRIBED

before me this 29 day of
Sept, 1982.

Susan E. Backus
NOTARY PUBLIC