



Portland General Electric Company

Bart D. Withers Vice President

January 14, 1983

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington DC 20555

Dear Mr. Clark:

Safety Evaluation Report for Environmental
Qualification of Safety-Related Electrical Equipment

The subject Safety Evaluation Report (SER) was received by Portland General Electric Company (PGE) on December 23, 1982. It attached a Technical Evaluation Report (TER), by Franklin Research Center (FRC), which contains certain identified information previously claimed to be proprietary. PGE was requested to review the enclosed TER with their owner or originator and notify the NRC within seven (7) days of receipt of the SER whether any portions of the identified pages still require proprietary protection.

In a letter dated December 30, 1982, PGE requested an additional 2 weeks (until January 14, 1983) to complete this determination. Our conclusions are summarized below.

The SER states that "During the preparation of the enclosed TER, FRC used test reports and other documents supplied by the licensee that included material claimed to be proprietary by the owners and originators". This assertion is in error. A review of our records indicates that no proprietary documents or information has been supplied by PGE to the NRC or FRC. FRC has evidently obtained these documents directly from the vendor, presumably with associated nondisclosure documentation that addresses restrictions on disclosure of portions of the proprietary documents.

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Reviewing the TER indicates that there is no basis that we can reasonably use to judge whether the portions of the vendor proprietary documents identified by FRC should themselves be considered proprietary. Only vendors can make those determinations. Furthermore, discussions with

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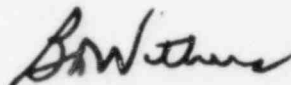
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a major equipment vendor indicate they have serious reservations about whether FRC has in fact identified all proprietary material. However, they would be willing to discuss methods to resolve this issue generically.

Summary information provided on System Component Evaluation Work Sheets directly by PGE has been determined to be nonproprietary, as discussed in NRC Generic Letter No. 81-15, dated March 10, 1981. It is, however, not clear that the summaries prepared by FRC fall into this category.

In conclusion, we believe the onus falls on the NRC and FRC to determine what portions of the TER require proprietary protection.

Sincerely,



Bart D. Withers
Vice President
Nuclear

Enclosure

c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy