

C-E Power Systems
Combustion Engineering, Inc.
1000 Prospect Hill Road
Windsor, Connecticut 06095

Tel. 203/688-1911
Telex: 99297

GE POWER SYSTEMS



Docket No.: STN-50-470F

March 3, 1982
LD-82-025

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Sample Environmental Test Report

Reference: A. E. Scherer letter to D. G. Eisenhut, dated January 29, 1982

Dear Mr. Eisenhut:

The referenced letter promised a sample environmental test report for Staff review. The sample report, along with appendices discussing thermal equivalence and test uncertainties, is attached. This report was synthesized from existing data, where available, and is being provided only as a sample of the type of report which will be generated by the use of our Topical Report on Class 1E Qualification, CENPD-255. (It is not intended to serve in any way as the formal submittal of the test report for this, or any other, particular piece of equipment.) This report is proprietary and the non-proprietary version will be provided within the next two weeks.

If we can be of any additional assistance, please feel free to contact either myself or Mr. G. A. Davis of my staff at (203)688-1911, Extension 2803.

Very truly yours,

COMBUSTION ENGINEERING, INC.

A. E. Scherer
Director
Nuclear Licensing

AES:ctk

Attachment

E003
5/20

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PDR ADDCK 05000470
A PDR

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, A. E. Scherer depose and say that I am the Director, Nuclear Licensing of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the application of CESSAR-F, for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

Qualification Test Report for Electrical Filter Assembly, LD-82-025.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure is calculations and analysis of aging, thermal equivalence and test uncertainties which is owned and has been held in confidence by Combustion Engineering.

2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a substantial competitive advantage to Combustion Engineering.

3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F.M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject document herein are proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:

a. A similar product is manufactured and sold by major pressurized water reactors competitors of Combustion Engineering.

b. Development of this information by C-E required thousands of manhours and tens of thousands of dollars. To the best of my knowledge and

belief a competitor would have to undergo similar expense in generating equivalent information.

c. In order to acquire such information, a competitor would also require considerable time and inconvenience in performing the necessary research calculations and analysis.

d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

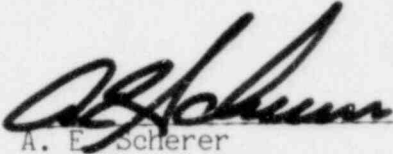
e. The information consists of detailed analyses of thermal equivalence, aging and test uncertainties, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems

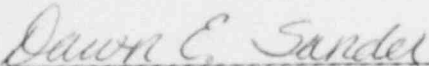
by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.


A. E. Scherer
Director, Nuclear Licensing

Sworn to before me

this *2nd* day of *March, 1982*


Notary Public

DAWN E. SANDER, NOTARY PUBLIC
State of Connecticut No. 61536
Commission Expires March 31, 1986