

EXXON NUCLEAR COMPANY, Inc.

2101 Horn Rapids Road

P. O. Box 130, Richland, Washington 99352

Phone: (509) 375-8100 Telex: 15-2878

April 20, 1983
JCC:061:83

Dr. Cecil O. Thomas, Chief
Standardization and Special Projects Branch
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

- Subject: (1) XN-CC-38, "Users Manual for PTSPWR2 - A Fortran Program for Simulation of Pressurized Water Reactor Plant Transients," dated December 1976.
- (2) XN-CC-38, Supplement 1, "Users Manual for PTSPWR2 - A Fortran Program for Simulation of Pressurized Water Reactor Plant Transients," dated October 1979.

Ref.: Letter, J.C. Chandler (ENC) to C.O. Thomas (NRC), dated February 3, 1983; JCC:026:83.

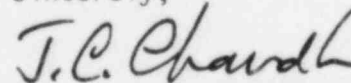
Dear Dr. Thomas:

Enclosed for your use are twenty-five (25) copies of each of the subject topical reports regarding ENC's plant transient methodology for pressurized water reactors. These reports are provided for the Staff's use in the reactivated review of the methodology as requested in the referenced letter.

Exxon Nuclear Company considers information contained in the subject reports 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 the subject documents from public disclosure.

If you have any questions or comments regarding this submittal, please feel free to call me, telephone (509) 375-8639.

Sincerely,



J. C. Chandler
Reload Fuel Licensing

cc: Mr. D.H. Moran (USNRC)

8305030292 830420
PDR TOPRP EMVEXXN
C PDR

1007
1/25

6. The Documents contain 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 safety 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 Documents.

8. The disclosure of the proprietary information contained in the Documents 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 safety analysis methods, and would result in substantial harm to the competitive position of ENC.

9. The Documents contain 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 Documents 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. These Documents provide information which reveals PWR safety analysis methods developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the analysis methods revealed in the Documents. 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 Documents.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.


FURTHER AFFIANT SAYETH NOT.



SWORN TO AND SUBSCRIBED

before me this 21 day of

April, 1983.



NOTARY PUBLIC