

Bechtel Power Corporation

Engineers — Constructors

15740 Shady Grove Road
Gaithersburg, Maryland 20877
301—258-3000



December 9, 1982

Mr. Dennis Allison
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Submittal of Confidential and
Proprietary Bechtel Information

Dear Mr. Allison:

In accordance with your request, we have furnished you with proprietary information as defined in the attached affidavit. This information is submitted in confidence for the strictly confidential use of NRC personnel for official purposes. For the reasons stated in the attached affidavit, we request that the information be withheld from public disclosure in accordance with 10 CFR Section 2.790.

We also request that the information not be disclosed to NRC contractors or consultants without the prior approval of Bechtel Power Corporation. In this regard, we wish to be promptly notified of the name of any third party, including NRC contractors or consultants and individuals within their organizations, requiring or requesting access to the information. Such notice will give us the opportunity to negotiate confidentiality agreements, or make other arrangements with such parties as a condition of disclosure. If a request for disclosure of this information is received, please call Mr. B. L. Meyers, Project Manager, at (301) 258-4055.

Bechtel Power Corporation reserves the right to withdraw the information if its not determined to be proprietary and subject to withholding under 10 CFR Section 2.790.

Finally, assuming the NRC recognizes the information as proprietary, we request that the information in its entirety,

E003

ADD:

D. Allison

Bechtel Power Corporation

Mr. Dennis Allison

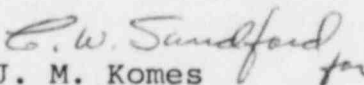
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December 9, 1982

including all copies thereof, be returned to Bechtel Power Corporation upon the completion of the NRC's technical analysis of the information.

Thank you for your assistance and cooperation.

Very truly yours,


J. M. Komes
Vice President and
General Manager

JMK/AIC/tw

cc: Edward C. Shomaker, Esq.
Office of the Executive Legal Director
U. S. Nuclear Regulatory Commission

BECHTEL POWER CORPORATION
AFFIDAVIT

I, Bernard L. Meyers, being duly sworn, depose and state as follows:

1. I am Project Manager of Project 10466, Standardized Nuclear Unit Power Plant Systems, for Bechtel Power Corporation. I have reviewed and am familiar with the information described in Paragraph 2 which is sought to be withheld and I am authorized to apply for its withholding.

2. The information submitted herewith to the Nuclear Regulatory Commission ("NRC") is contained in the information described below (the "Information").

1. Bechtel Specification J-110
2. Bechtel Specification J-104
3. Bechtel Calculation FL-01, Rev. 0
4. Bechtel Calculation PB FC-01, Rev. 1
5. Bechtel Calculation PB FC-01, Rev. 2
6. Bechtel Calculation FC-13, Rev. 0

3. The Information submitted herewith to the NRC in accordance with its request is submitted in confidence and is sought to be withheld in accordance with 10 CRF Section 2.790 for the following reasons:

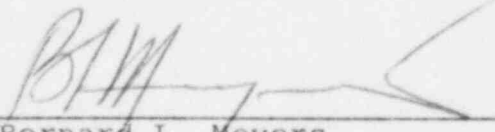
- a. The Information contains trade secrets of Bechtel Power Corporation.
- b. The Information contains proprietary and confidential commercial information and data of Bechtel Power Corporation.
- c. The Information contains proprietary and confidential discoveries and records of Bechtel Power Corporation.
- d. The Information, which includes calculations which are highly technical and interrelated with other calculations, is subject to being taken out of context, misinterpreted, or misconstrued.

4. The following considerations are applicable to the reasons set forth in Paragraph 3 above:

- a. The Information has been held in confidence by Bechtel Power Corporation.
- b. The Information is of a type customarily held in confidence by Bechtel Power Corporation and there are rational bases therefor as set forth in Paragraph 3 above and in this Paragraph.
- c. The Information has been and is being transmitted to the NRC in confidence.
- d. The Information is not available in public sources.
- e. Public disclosure of the Information is likely to cause substantial harm to the competitive position of Bechtel Power Corporation for the following reasons:
 - 1) The Information is valuable to Bechtel Power Corporation because it represents unique approaches and capabilities for resolving complex safety, technical, commercial and industrial issues to comply with applicable laws, statutes and regulations.
 - 2) Substantial and significant effort and money has been and is being expended by Bechtel Power Corporation to develop, acquire and maintain the necessary expertise and capability in these highly specialized areas.
 - 3) Others would have difficulty in properly acquiring or duplicating the Information which represents special applications of theoretical principles, complex analytical procedures and sophisticated design techniques.

The foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information, and belief.

Executed at Gaithersburg, Maryland this 9th day of December, 1982.



Bernard L. Meyers
Bechtel Power Corporation

STATE OF MARYLAND)
 SS
COUNTY OF MONTGOMERY)

On this 9th day of December, 1982, before me, the undersigned officer, personally appeared Bernard L. Meyers, known to me to be the person whose name is subscribed to the within instrument and acknowledged.

In witness whereof I hereunto set my hand and official seal.

Roberta B. Curran

Notary Public

SWORN TO, IN MY PRESENCE
THIS 10th DAY OF Dec. 1982

My Commission expires: _____

SEAL

My Commission Expires July 1, 1986