



CHEM-NUCLEAR SYSTEMS INC.

240 Stoneridge Drive, Suite 100 • Columbia, South Carolina 29210 • 803/256-0450

December 23, 1983
RA-0317-3

Mr. Charles A. Willis
Leader, Effluent Treatment System Section
Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20014

Dear Mr. Johnson:

Chem-Nuclear Systems, Inc. hereby submits the attached licensing topical report (CNSI-DW-11118-01, "CNSI Dewatering Control Process Containers Topical Report, hereinafter "the Report") in both proprietary and non-proprietary versions. The Report is dated December 23, 1983 and is submitted for review and acceptance under the NRC Topical Report Program for referencing in licensing applications.

We hereby submit twenty-five copies of the Report containing proprietary information which are to be withheld from public disclosure. Fifteen copies contain no proprietary information and can be made available for public disclosure. An affidavit is herein submitted concerning the confidential information and trade secrets contained in the proprietary version.

Please do not hesitate to contact us for any additional information you require with regard to this Report.

Very truly yours,

CHEM-NUCLEAR SYSTEMS, INC.

L. K. Poppe
Corporate Health Physicist

LKP:ps

Enclosure: 25 copies CNSI-DW-11118-01-P
15 copies CNSI-DW-11118-01-NP

8312280444 831223
PDR TOPRP EMVCNSI
B PDR

*Two Rids
1007 1/25 Prop
1008 1/15 Non-Prop*

c: M. J. Jump, Columbia, w/o attachment
D. G. Ebenhack, w/o attachment
T. J. McCord, w/o attachment
L. K. Poppe, w/attachment
G. A. Rae, w/o attachment
Document Control, w/attachment
J. E. Purvis, Barnwell, w/o attachment

AFFIDAVIT SUBMITTED TO NUCLEAR REGULATORY COMMISSION
CONCERNING CONFIDENTIAL INFORMATION AND TRADE SECRETS
CONTAINED IN CHEM-NUCLEAR SYSTEMS, INC.
DEWATERING CONTROL PROCESS TOPICAL REPORT

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND) ss:

David G. Ebenhack states as follows on behalf of Chem-Nuclear Systems, Inc.:

1. I am the Vice President of Regulatory Affairs for Chem-Nuclear Systems, Inc.

2. I have reviewed and am familiar with the contents of the Report prepared by Chem-Nuclear Systems, Inc., dated December 1983 and entitled "CNSI Dewatering Control Process Topical Report, CNSI-DW-11118-01" (hereinafter called "the Report").

3. Chem-Nuclear Systems, Inc. (hereinafter "CNSI") has submitted forty copies of the Report to the Nuclear Regulatory Commission. Twenty-five copies of such Report contain proprietary information which should be withheld from public disclosure. The other fifteen copies of the Report furnished to the Commission do not contain proprietary information, as trade secret information and privileged commercial data have been removed from these copies so as to make them available for such public disclosure as may be requested.

4. CNSI, as part of its radioactive waste disposal services, provides a variety of dewatering containers, dewatering systems and procedures which in most respects are unique. Detailed information concerning the design operation and certification data has always been held in confidence by CNSI. The specific container intervals, the types of filter arrays, and the procedures used to certify the total system are considered confidential information that include Company trade secrets incorporated into such design and processes, which confidential information is deleted from the forty copies of the abbreviated CNSI Report furnished to the Commission and available for public disclosure.

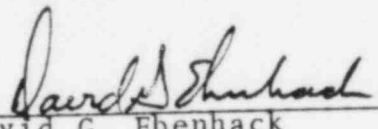
Employees of CNSI sign an agreement regarding protection of trade secret information at the time of entering Company employment, and the data contained in the proprietary version of the Report submitted to the Commission contains the type of information CNSI regards as protected and of the type not to be disclosed to unauthorized persons, including especially competitors, by present or former employees.

5. CNSI has obtained a competitive edge in the field of dewatering aqueous low-level radioactive waste streams because of its extensive experience in this field and financial commitment to research, development and design concerning container components and certifications. CNSI dewatering systems, container design, procedures, and certifications are presently superior to equipment and processes used by competitors for similar processes and this superiority is the basis on which systems details are being withheld.

The information contained in the proprietary version of the Report is not available from public sources.

6. Public disclosure of the proprietary version of the Report would cause substantial harm to the competitive position of CNSI. The Company has invested approximately one million dollars over the last several years in engineering salaries and testing programs and has spent over two hundred fifty thousand dollars improving this system and conducting certification testing on this Report alone. Additionally, the Company has nearly one-half million dollars in capital investment for operating systems supporting the field operation of this Report. Competitors of CNSI would have great difficulty in duplicating the system developed by CNSI, due not only to the financial investment of the Company, but also to the unique skills, talents and expertise of CNSI employees who developed the system which is described in detail in the proprietary version of the Report.

7. The right of the public to disclosure of information held by the government is protected by the submission by CNSI of fifteen copies of the Report with confidential trade secret information omitted, and therefore, the CNSI competitive position clearly deserves protection, in regard to the twenty-five copies of the Report containing confidential information.



David G. Ebenhack
Vice President, Regulatory Affairs

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

ss:

On this 23rd day of December 1983, before me, a Notary Public in and for the State of South Carolina, duly commissioned and sworn, personally appeared David G. Ebenhack, to me known to be the Vice President of Regulatory Affairs for Chem-Nuclear Systems, Inc., and on oath stated that he was authorized to make this affidavit on behalf of the Corporation.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal the day and year first above written.

Michael A. Mann
NOTARY PUBLIC in and for the State
of South Carolina, residing in
Columbia SC
My Commission Expires February 23, 1992