



Aerojet  
Energy Conversion  
Company

P.O. Box 13222  
Sacramento, California 95813  
Telephone (916) 355-2000

May 1, 1984  
0500:4014:RG:ab

Mr. Cecil Thomas, Chief  
Standardization and Special Projects Branch  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555

Reference: (a) Topical Report Review Status, Office of Nuclear Reactor  
Regulation, United States Nuclear Regulatory Commission,  
NUREG-0390, Vol. 7, No. 1, July 15, 1983

Dear Mr. Thomas:

The Aerojet Energy Conversion Company (AECC) is pleased to submit its new Topical Report entitled, "Mobile Volume Reduction System" to the United States Nuclear Regulatory Commission for its review and acceptance as a referencing document in utility licensing applications. In accordance with Reference (a), I am enclosing 12 copies of the non-proprietary report (Enclosure (1)) and 22 copies of the proprietary report (Enclosure (2)).

This Topical Report describes the AECC Mobile Volume Reduction System (MVRS) that is capable of processing combustible dry active wastes and contaminated oil generated at central station nuclear power plants and converting these wastes to an ash product, thereby effecting substantial volume reduction of the waste that must be shipped to a burial site or stored onsite. This mobile system consists of the combustible waste processor and off-gas cleanup system and is packaged on three trailers that can be moved from one plant site to another. Thus, a single system has the capability of servicing several plant sites annually.

AECC expects that the subject Topical Report will be referenced in a number of utility license applications. Specifically, Commonwealth Edison Company has entered into a contract with AECC to utilize the AECC MVRS initially at its Dresden Station, and subsequently at other Commonwealth Edison Company nuclear stations, including Zion, Quad Cities, and La Salle. It is expected that Commonwealth Edison Company will reference the AECC Topical Report in its license submittal. In addition, many other U.S. nuclear utilities are evaluating the system for use at their plants. We believe that this report contains complete and detailed information on the system and is suitable for review. NRC approval of this report as a referencing document will result in increased efficiency of the review process for applications which reference the report.

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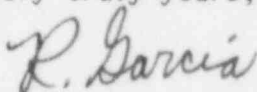
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May 1, 1984

Enclosure (3) represents our "Application Under 10 CFR 2.790(b) for Withholding from Public Disclosure" the proprietary Topical Report No. AECC-4-P.

We are requesting that the review of the subject Topical Report be conducted as expeditiously as possible to support a schedule of proposed initial operation at the Dresden Station of February 1, 1985. I will be contacting your office in the near future to discuss the schedule for review of this Topical Report. I wish to thank Mr. Dave Moran of your branch for his help in answering our many questions during the preparation of the Topical Report.

Very truly yours,



Dr. Ramon Garcia  
Program Manager  
Waste Management Systems

- Enclosures: (1) Aerojet Energy Conversion Company Topical Report No. AECC-4-NP, entitled, "Mobile Volume Reduction System" (Non-Proprietary Document), May 1, 1984 (12 copies)  
(2) Aerojet Energy Conversion Company Topical Report No. AECC-4-P, entitled, "Mobile Volume Reduction System" (Proprietary Document), May 1, 1984 (22 copies)  
(3) Application Under 10 CFR 2.790 (b) for Withholding from Public Disclosure, Topical Report No. AECC-4-P (Proprietary Report)

cc: Mr. David Moran, Program Manager  
U.S. NRC  
Washington, D.C. 20555

Mr. William Gammill, Chief  
METB  
U.S. NRC  
Washington, D.C. 20555

Dr. Ron Coley, Commonwealth Edison Company (1 Copy AECC-4-NP)  
Mr. Don Eggett, Commonwealth Edison Company (1 Copy AECC-4-NP)  
Mr. Jim Testa, Commonwealth Edison Company (1 Copy AECC-4-NP)  
Mr. Paul Deltete, Gilbert Associates (1 Copy AECC-4-NP)  
Mr. Jack Daly, United Minerals & Energy (1 Copy AECC-4-NP)



AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Aerojet Energy Conversion Company  
State of California  
County of Sacramento

I, Stanley P. Ferreira, am the Manager, Contracts and Business Administration, of Aerojet Energy Conversion Company, 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 for withholding this information.

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

Aerojet Energy Conversion Company Topical Report No. AECC-4-P, entitled, "Mobile Volume Reduction System", May 1, 1984.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Aerojet Energy Conversion Company 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 are (a) Piping and Instrumentation Diagrams for the Aerojet Energy Conversion Company Mobile Volume Reduction System, and (b) Material Balance Flow Diagram for the Aerojet Energy Conversion Company Mobile Volume Reduction System, both of which are owned and have been held in confidence by the Aerojet Energy Conversion Company.
2. The Piping and Instrumentation Diagrams contain information relating to the type, placement, and number of process instruments required for control of the process. These diagrams also contain information on the various control loops and control logic and represent the control system design. The Material Balance Flow Diagram contains the pressures, temperatures, and flow rates existing throughout the system and represents the process design. Application of this information results in a substantial competitive advantage to Aerojet Energy Conversion Company.
3. The information is of a type customarily held in confidence by Aerojet Energy Conversion Company and not customarily disclosed to the public. Aerojet Energy Conversion Company 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. This system was applied in determining that the subject document herein is 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 Aerojet Energy Conversion Company because:

- a. Similar products are being marketed by major competitors of AECC.
- b. Development of this information by AECC required thousands of man-hours of effort and hundreds 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 related to development of experimental and demonstration test facilities.
- d. The information represents the control system design and the process design, 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 AECC, take marketing or other actions to improve their product's position or impair the position of AECC's product, and avoid developing similar information in support of their processes, methods, or apparatus.
- e. In pricing AECC's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance, and other costs and expenses must be included. The ability of AECC's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

f. Use of the information by competitors in the international marketplace could increase their ability to market mobile radioactive waste volume reduction systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on AECC's potential for obtaining or maintaining foreign licenses.

S. P. Ferreira  
S. P. Ferreira, Manager  
Contracts & Business Administration

GENERAL ACKNOWLEDGMENT

NO. 201

State of California  
County of Sacramento } SS.

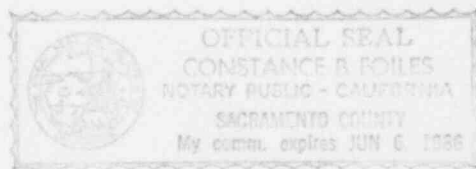
On this the 20 day of April 1984, before me,

Constance B. Foiles

the undersigned Notary Public, personally appeared

S.P. Ferreira

☐ personally known to me  
☒ proved to me on the basis of satisfactory evidence  
to be the person(s) whose name(s) is subscribed to the  
within instrument, and acknowledged that he executed it.  
WITNESS my hand and official seal.



Constance B. Foiles  
Notary's Signature