



Aerojet
Energy Conversion
Company

P.O. Box 13222
Sacramento, California 95813
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August 10, 1984
0500:4213:RG:ab

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

Subject: Submittal of Amendment 2 to Aerojet Energy Conversion Company
Topical Report No. AECC-2-P(NP)

- References: (a) Letter from Mr. Cecil O. Thomas, NRC to Dr. R. Garcia,
Aerojet Energy Conversion Company, subj: "Request for
Additional Information on Topical Report No. AECC-2-P(NP)
and Amendment No. 1", dtd July 23, 1984
- (b) 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:

Reference (a) requested additional information on the Aerojet Energy
Conversion Company (AECC) Topical Report No. AECC-2-P(NP) and Amendment 1
to the Topical Report. In accordance with Reference (b), AECC has prepared
an Amendment 2 to the Topical Report No. AECC-2-P(NP) which contains the
additional information requested. I am enclosing 12 copies of the non-
proprietary amendment (Enclosure (1)), and 22 copies of the proprietary
amendment (Enclosure (2)).

Enclosure (3) represents our "Application Under 10CFR2.790(b) for Withholding
from Public Disclosure" the proprietary Amendment 2 to Topical Report No.
AECC-2-P(NP).

I trust that the information supplied in the Amendment No. 2 submittal will
allow the NRC to conclude its review of Topical Report No. 2 and issue a
letter of acceptance and corresponding Safety Evaluation Report by
September 1, 1984.

*Need
2 Rids*

*T008
1/12
(non-prop)*

*T001
1/22
(prop)*

Mr. Cecil O. Thomas, Chief

-2-

August 10, 1984

I want to thank Mr. David Moran of your branch and Mr. Jack Hayes of the Meteorology and Effluent Treatment Branch for their help and guidance during the review of the subject Topical Report.

Very truly yours,

R. Garcia

Dr. Ramon Garcia
Program Manager
Waste Management Systems

Enclosures

cc: Mr. David Moran, Program Manager (1 copy AECC-2-NP, Amendment 2)
U.S. NRC
Washington, D. C. 20555

Mr. William Gammill, Chief (1 copy AECC-2-NP, Amendment 2)
METB
U.S. NRC
Washington, D. C. 20555

Mr. John J. Hayes, Jr. (1 copy AECC-2-NP, Amendment 2)
METB
U.S. NRC
Washington, D. C. 20555

Mr. Jack Brynildssen - Commonwealth Edison Company (1 copy AECC-2-NP,
Amendment 2)

Mr. Tom Tramm - Commonwealth Edison Company (1 copy AECC-2-NP, Amendment 2)

Mr. Frank Krohn - Sargent & Lundy Engineers (1 copy AECC-2-NP, Amendment 2)

Mr. Barry Breindel - Aerojet-General Corporation, Washington, D.C.
(1 copy AECC-2-NP, Amendment 2)



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, Amendment 2 to Topical Report No. AECC-2-P, entitled, "Radioactive Waste Volume Reduction System," August 10, 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 (1) Piping and Instrumentation Diagrams for the Aerojet Energy Conversion Company Radioactive Waste Volume Reduction System, and (2) Material Balance Flow Diagram for the Aerojet Energy Conversion Company Radioactive Waste 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 would increase their ability to market 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.

GENERAL ACKNOWLEDGMENT

NO. 201

State of California }
County of Sacramento } SS.

On this the 9th day of August 19 84, before me,

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) SS subscribed to the within instrument, and acknowledged that he executed it. WITNESS my hand and official seal.



Dorothy L. Mc Hale
Notary's Signature