

**Florida  
Power**

CORPORATION  
Crystal River Unit 3  
Docket No. 50-302

December 13, 1995  
3F1295-17

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Subject: Technical Specification Change Request No. 203, Revision 0  
Small Volume Eddy Current Indication Disposition

Dear Sir:

On December 5, 1995, Florida Power Corporation (FPC) submitted responses to several 'Requests for Additional Information' associated with Technical Specification Change Request No. 203. The responses were arranged in one attachment and three appendices. Appendices A and B contain information that FPC considers proprietary. FPC is submitting an affidavit requesting the technical essays contained in Appendices A and B be withheld from public disclosure on the grounds that the Appendices contain information proprietary to FPC. The affidavit is provided in accordance with 10 CFR 2.790 (b)(1). Attachment 1 and the Public Meeting being held between FPC and the NRC on December 15, 1995 will summarize the technical conclusions contained therein in such a manner as to facilitate public understanding and involvement.

We apologize for this request being sent separate and apart from the original submittal, but we did not wish to delay the responses to the RAI awaiting our proprietary review.

Sincerely,

P. M. Beard, Jr.  
Senior Vice President  
Nuclear Operations

Attachment

xc: Regional Administrator, Region II  
Senior Resident Inspector  
NRR Project Manager

100002

CRYSTAL RIVER ENERGY COMPLEX: 15760 W Power Line St • Crystal River, Florida 34428-6708 • (352) 795-6486

A Florida Progress Company

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AFFIDAVIT OF P. M. BEARD, JR.

- A. My name is P. M. Beard, Jr. I am the Senior Vice President - Nuclear Operations for the Florida Power Corporation (FPC), and as such I am authorized to execute this affidavit.
- B. I am familiar with the criteria set forth in Title 10 of the Code of Federal Regulations, Part 2.790 (10 CFR 2.790), to determine whether certain information of FPC is proprietary.
- C. The following information is provided to demonstrate that the provisions of 10 CFR 2.790 have been considered:
- (i) The information contained in Appendices A and B have been held in confidence by FPC. Copies of the document are clearly identified as proprietary. In addition, should FPC transmit the information in Attachment 2 to an external agency, the recipient will be requested to hold the information as proprietary, as FPC has requested the Nuclear Regulatory Commission to so do.
  - (ii) FPC applied the following criteria in determining whether the information in Attachment 2 should be classified as proprietary. Information may be classified as proprietary if one or more of these criteria are met:
    - a. The information reveals data or material concerning FPC research or development plans or programs of present or potential competitive advantage to FPC.
    - b. The use of the information by a competitor would decrease his expenditures, in time or resources, in designing, producing or marketing a similar product.
    - c. The information consists of test data or other similar data concerning a process, method, or component, the application of which results in a competitive advantage to FPC.
    - d. The information reveals special aspects of a process, method, component or the like, the exclusive use of which results in a competitive advantage to FPC.

FPC has determined that the document listed as Appendices A and B contain information which falls within one or more of the criteria enumerated above.

AFFIDAVIT OF P. M. BEARD, JR. (Cont'd.)

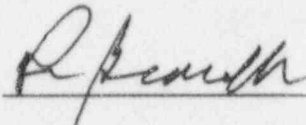
- (iii) While the document listed as Appendices A and B, which has been made available to the United States Nuclear Regulatory Commission was not originally made available in confidence, a request that the document and the information contained therein be withheld from public disclosure is hereby being made.
  - (iv) The information contained in Appendices A and B is not available in the open literature and to the best of our knowledge is not known by current or potential domestic or foreign competitors of FPC.
  - (v) The information contained in Appendices A and B, if not held in confidence, could cause harm to FPC in that a competitor could use the information for their gain without having expended the financial and technical resources expended by FPC. FPC has expended significant time, money, and manpower to compile this information into the form contained herein.
- D. I have personally reviewed the document listed as Appendices A and B and have found that it is considered proprietary by FPC because it contains information which falls within one or more of the criteria enumerated in Paragraph C. Appendices A and B contains information which affords FPC an opportunity to obtain a competitive advantage over those who may wish to know or use the information contained in the document.

  
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P. M. Beard, Jr.

STATE OF FLORIDA

COUNTY OF CITRUS

P. M. Beard, Jr. states that he is the Senior Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

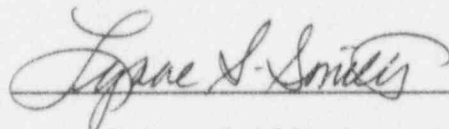


P. M. Beard, Jr.  
Senior Vice President  
Nuclear Operations

P. M. Beard, Jr., personally known to me. Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 13th day of December, 1995.

LYNNE S. SMITH

Notary Public (print)



Notary Public (signature)

Notary Public, State of Florida at Large,  
Notary Public, State of Florida at Large  
My Commission Expires Dec. 18, 1995  
Bonded thru Agent's Notary Brokerage