



ARKANSAS POWER & LIGHT COMPANY  
 POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000  
 August 30, 1984

2CAN088412

Director of Nuclear Reactor Regulation  
 ATTN: Mr. James R. Miller, Chief  
 Operating Reactors Branch #3  
 Division of Licensing  
 U. S. Nuclear Regulatory Commission  
 Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Unit 2  
 Docket No. 50-368  
 License No. NPF-6  
 ANO-2 Inadequate Core Cooling Order  
 Final Report of ICC Instrument  
Confirmatory Test Program

Gentlemen:

As committed during the July 12, 1984 meeting, we have enclosed five (5) copies (copies nos. 01-05) of R-84-011-P "Final Report for Phase I of the AP&L ICC Monitoring System Confirmatory Test Program," by Technology for Energy Corporation (TEC) for AP&L. Five non-proprietary copies are also enclosed. The report demonstrates the capability of the AP&L ICC incore instruments for ANO-2 to satisfy the requirements specified in NUREG 0737, Item II.F.2 in accordance with the December 10, 1982, Order for Modification.

Due to the proprietary nature of the information contained in R-84-011-P, AP&L requests this report to be withheld from public disclosure in accordance with the provisions of 10CFR Part 2.790. The reasons for the proprietary classification of this report are delineated in the enclosed affidavit.

In keeping with our intention to install this instrumentation during the upcoming 2R4 refueling outage, we are ready to meet with your staff and discuss this report at your earliest convenience. Please contact us with regard to your desire for a meeting.

Very truly yours,

*John R. Marshall*  
 John R. Marshall  
 Manager, Licensing

*Change: LPDR } Non Prop  
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AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Technology for Energy Corporation )  
State of Tennessee )  
County of Knox )  
and ) SS.:  
Arkansas Power & Light Company )  
State of Arkansas )  
County of Pulaski )

I, J. C. Robinson, depose and say that I am the Vice President, Products Group of Technology for Energy Corporation (TEC) and I, J. M. Griffin, depose and say that I am the Senior Vice President, of Arkansas Power & Light Company (AP&L), both 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. This information is submitted in conformance with the provisions of 10 CFR Part 2.790 of the Commission's regulations in connection with applications for withholding.

The information for which proprietary treatment is sought is contained in the document "Final Report for the AP&L ICC Monitoring System Confirmatory Test Program," TEC Report No. R-84-011-P.


Pursuant to the provisions of paragraph (b) (4) of Part 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.

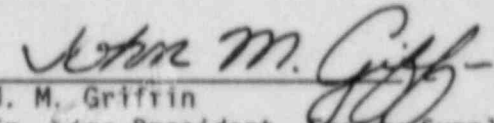
1. The information sought to be withheld from public disclosure are the details of the Radcal Inventory Meter (RIM) for ICC monitoring which is owned and has been held in confidence by TEC and AP&L.
2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a substantial competitive advantage to TEC, and is of financial interest to AP&L.
3. The information is of a type customarily held in confidence by commercial entities and not customarily disclosed to the public.
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 our 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 TEC and to the financial interests of AP&L because:
  - a. Products for similar application are manufactured and sold by major nuclear industry competitors of TEC;
  - b. Development of this information by TEC and AP&L required hundreds of manhours of effort and tens of thousands of dollars. To the best of our 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 developing an equivalent incore inventory monitoring technique;
  - d. AP&L and TEC have undertaken the effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable;
  - e. The information consists of details of design, construction and operation of the RIM, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their products to better compete with TEC, take marketing or other actions to improve their product's position or impair the position of TEC's products, and avoid developing similar data and analyses in support of their processes, methods or apparatus;
  - f. In pricing TEC's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of TEC's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs; and
  - g. Use of this information by competitors in international markets would increase their ability to market similar core inventory monitoring systems by reducing the costs associated with their

technology development. In addition, disclosure would have an adverse economic impact on TEC's potential for obtaining or maintaining foreign licensees.

Further the deponents sayeth not.

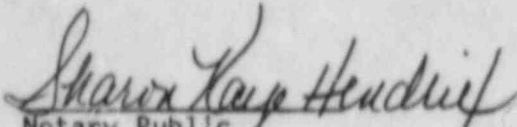
  
J. C. Robinson  
Vice President, Products Group  
Technology for Energy Corporation

  
J. M. Griffin  
Sr. Vice President, Energy Supply  
Arkansas Power & Light Company

State of Arkansas  
County of Pulaski

Sworn to before me

this 30 day of August, 1984

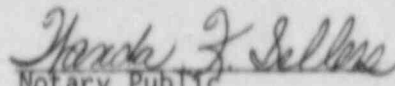
  
Notary Public

My Commission Expires: 9/19/89

State of Tennessee  
County of Knox

Sworn to before me

this 4th day of September, 1984.

  
Notary Public

My Commission Expires: 10/20/87