

ARKANSAS POWER & LIGHT COMPANY

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March 15, 1985

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Director of Nuclear Reactor Regulation ATTN: Mr. J. F. Stolz, Chief Operating Reactors Branch #4 Division of Licensing U. S. Nuclear Regulatory Commission Washington, DC 20555

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 - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Summary Report Phase I of AP&L
ICC Monitoring System Program
Test Series Revision 1

Gentlemen:

On October 17, 1984, representatives of Arkansas Power & Light Company (AP&L) and Technology for Energy Corporation (TEC) met with members of the NRC staff to present the ICC Monitoring System Phase I Confirmatory Test Program results. During the presentation, information in addition to that contained in Report No. R-84-011-P was provided by AP&L and TEC representatives. By letter dated November 16, 1984 (ØCAN1184Ø5), AP&L stated that the additional information would be documented in a revision to the report. AP&L hereby supersedes the submittal dated August 30, 1984, (2CANØ88412), and dockets the revised report entitled, "Summary Report - Phase I of AP&L ICC Monitoring System Program Test Series - Revision 1". Please note that NRC has concluded that this report demonstrates the "proof in principle" for the design concept as stated by your letter dated January 30, 1985.

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Due to the proprietary nature of the information contained in Report No. R-84-011-P Revision 1, we request this report be withheld from public disclosure in accordance with the provisions of 10CFR2.790. The reasons for the proprietary classification of this report are delineated in the enclosed affidavit. To accommodate this request, five (5) copies (copy nos. 01-05) of Report No. R-84-011-P Rev. 1 and five (5) copies of Report No. R-84-011-NP Rev. 1 are enclosed for your use.

Very truly yours,

J. Ted Enos

Manager, Licensing

JTE: DGM: ds

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

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

I, C. W. Craven, Jr., depose and say that I am the Group Vice President of Operations for 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 "Summary Report Phase I of AP&L ICC Monitoring System Program Test Series," TEC Report No. R-84-011, Rev. 1.

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.

- 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.
- 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.
- 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: Products for similar application are manufactured and sold by major nuclear industry competitors of TEC; 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; 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; 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.

C. W. Craven, Jr.

Group Vice President, Operations 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 18th day of March, 1985

Karen Cone Notary Public

My commission Expires: 2-1-91

State of Tennessec County of Knox

Sworn to before me

this 12th day of February, 1985.

Notary Public

My Commission Expires: 10/20/87

rda F. Sellers