

# Bechtel Power Corporation

Engineers - Constructors

12400 East Imperial Highway

Norwalk, California 90650

MAIL ADDRESS

P.O. BOX 60860 - TERMINAL ANNEX, LOS ANGELES, CALIFORNIA 90060

TELEPHONE: (213) 807-2000



December 5, 1984

Mr. Harold R. Denton  
Director of the Office of  
Nuclear Reactor Regulation  
U.S. Regulatory Commission  
Washington, D.C. 20555

Re: Request for Production of Documents

Dear Mr. Denton:

This letter will serve as the application of Bechtel Power Corporation for exemption of the enclosed material from public disclosure. This application is authorized by 10 CFR 2.790 and is supported by the attached affidavit.

Thank you for your consideration of this matter. Please contact me if you have any questions.

A handwritten signature in cursive script, appearing to read "Martin Malcom".

Martin Malcom

Project Engineering Manager  
Bechtel Power Corporation

cc: E. C. Rodabaugh  
Sam Moore  
Jim Alzheimer

8412240124 841213  
PDR ADCK 05000424  
A PDR

State of California        )  
                                  ) ss  
County of Los Angeles     )

AFFIDAVIT OF MARTIN MALCOM

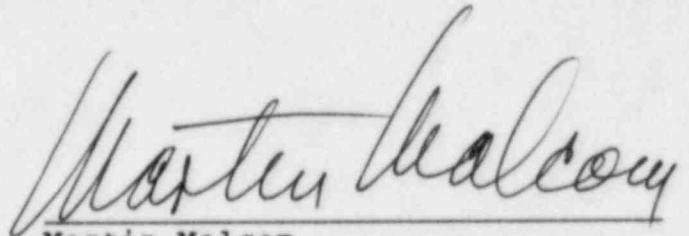
Martin Malcom, being first duly sworn, deposes and says:

1. That I am the Project Engineering Manager for Bechtel Power Corporation ("Bechtel"), Western Power Division, on the Vogtle Electric Generating Plant.
2. That, except for the matters expressly stated to be on my information and belief, I have personal knowledge of the facts set forth herein, and could competently testify thereto.
3. That I have been specifically delegated, by Bechtel, the function of reviewing the documents discussed herein and am authorized to apply for their withholding on behalf of Bechtel which is the owner of this information.
4. That, based on my information and belief, the Nuclear Regulatory Commission ("NRC") has requested production of certain documents to be used by NRC consultants.
5. That, based on my information and belief, the following documents are the documents sought:
  - a. Instruction Memo No. 8., "Allowable loads for flued head penetrations and the modeling of penetrations".
  - b. Instruction Memo No. 14, "The Seismic Anchor Movements (SAM) and Building Settlements".
  - c. Calculation No. X4CP-MS 7076  
Tag No. V1-1201-053-H002  
Miscellaneous Steel Calculation
  - d. Calculation No. X4CP-MS 7076  
Tag No. V1-1201-053-H001  
Miscellaneous Steel Calculation
  - e. Calculation No. X4CP-S 0250  
Tag No. V1-1301-012-H017  
Miscellaneous Steel Calculation
  - f. Calculation No. X4CP - 0250  
Tag No. V1-1301-010-H042  
Miscellaneous Steel Calculation

- g. Calculation No. X4CP-7075A  
Isometric No. 1K3-1301-010-02  
Main Steam Stress Calculation
  - l. Calculation No. X4CP-7075  
Isometric No. 1K5-1301-012-02  
Main Steam Stress Calculation
6. That the documents identified in Paragraph 5 are Bechtel documents.
7. That the documents identified in Paragraph 5 should not be disclosed because they are Bechtel's procedure describing Bechtel's means and methods for performing a portion of the design and construction. As such:
- a. The document contains trade secrets of Bechtel.
  - b. The document contains proprietary and confidential commercial information and data of Bechtel.
  - c. The document contains proprietary and confidential discoveries and records of Bechtel.
8. That the following considerations are applicable to the reasons set forth in Paragraph 7:
- a. The information is held in confidence by Bechtel.
  - b. The information is of a type customarily held in confidence by Bechtel and there is rational basis therefor as set forth in Paragraph 7 above and in this paragraph.
  - c. The information is being transmitted to the NRC in confidence..
  - d. The information is not available in public sources.
  - e. Public disclosure of the information is likely to cause substantial harm to the competitive position of Bechtel for the following reasons:
    - 1) The information is valuable to Bechtel because it represents unique approaches and capabilities for resolving complex safety, technical, commercial and industry factors to comply with applicable laws, statutes and regulations.
    - 2) Substantial and significant effort and money have been and are being expended by Bechtel to develop, acquire and maintain the necessary expertise and capability in these highly specialized areas.

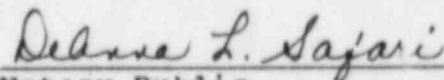
3) Others would have difficulty in property acquiring or duplicating the information which represents special applications of theoretical principles, complex analytical procedures and sophisticated design techniques.

9. For the reasons set forth in this affidavit Bechtel requests that the documents listed in paragraph 5 be designated as exempt from disclosure pursuant to 10 CFR 2.790.



Martin Malcom  
Project Engineering Manager,  
Vogtle Electric Generating Plant  
Bechtel Power Corporation

Subscribed and sworn to before me this 5th day of  
December, 1984.

  
Notary Public

