

Bechtel

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Gaithersburg, Maryland 20878-5356
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October 12, 1992

Document Control Desk
US Nuclear Regulatory Commission
Washington, DC 20555

Attention: Dr. Thomas Murley, Director

Dear Dr. Murley:

Subject: Application for Withholding Proprietary
Information from Public Disclosure

Reference: Virginia Power Letter "Final Design Change Package
90-13-1 for the Steam Generator Replacement Activity
at North Anna Unit 1".


The proprietary information for which withholding is being requested in the above referenced letter is further identified in the enclosed Affidavit signed by the owner of the proprietary information, Bechtel Power Corporation. The Affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.790 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Virginia Power.

Correspondence with respect to the proprietary aspects of the application for withholding or the Bechtel Power Corporation Affidavit should reference this letter and should be addressed to the undersigned.

Sincerely,

BECHTEL POWER CORPORATION



E. J. Reinsch
Vice President and Manager



Bechtel Power Corporation A unit of Bechtel Corporation

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Dr. T. Murley
October 12, 1992
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EJR/mds
Enclosures

cc: M. P. Siemien, Esq.
Office of the General Counsel, NRC

AFFIDAVIT

STATE OF MARYLAND

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MONTGOMERY COUNTY

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E. J. Reinsch, first being duly sworn, says:

1. I am Vice President and Manager, Bechtel Power Corporation. Bechtel Power Corporation is the owner of information identified in Attachment 1 to this affidavit, which Bechtel Power Corporation seeks to have withheld from public disclosure.
2. I am making this Affidavit pursuant to the provisions of the Nuclear Regulatory Commission's rules and regulations, including 10 CFR 2.790.
3. I have personal knowledge of the criteria and procedures utilized by Bechtel Power Corporation in determining and designating information as a trade secret or privileged or confidential commercial or financial information.

Under that system, information is customarily designated confidential and held in confidence if the release of that information might result in the loss of an existing or potential competitive advantage. Information which falls in one or more of the following categories is designated confidential:

- a. Information which reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by a competitor without license from Bechtel Power Corporation constitutes a competitive economic advantage over other companies.
- b. Information in the form of supporting data, including test data, relative to a process (or component, structure tool, method, etc.), the application of which data secures a competitive economic advantage, e.g. by optimization or improved marketability.
- c. Information which, if available to a competitor would reduce his expenditure or resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- d. Information concerning or relating to price, production capacities, budget levels, or commercial strategies of Bechtel Power Corporation, its customers or suppliers.

- e. Information which reveals aspects of past, present, or future Bechtel Power Corporation or customer funded development plans and programs of potential commercial value to Bechtel Power Corporation.
 - f. Information which contains patentable ideas or for which patent protection may be desirable.
 - g. Information relating to an invention.
4. The documents identified in Attachment 1 to this affidavit are marked "Proprietary" or are considered proprietary and are transmitted to the Nuclear Regulatory Commission in confidence.
5. The documents identified in Attachment 1 to this affidavit contain confidential commercial information consisting of engineering design details, the application of which results in a substantial competitive advantage to Bechtel Power Corporation.
6. The documents identified in Attachment 1 to this affidavit have been held in confidence by Bechtel Power Corporation and have been disclosed only after each proposed recipient of the information has executed an appropriate agreement if such agreement has been deemed necessary.
7. The information contained in the documents identified in Attachment 1 of this affidavit are not available in public sources and can not be properly acquired without the execution of an appropriate agreement maintaining the proprietary nature of the information from Bechtel Power Corporation.
8. Public disclosure of the document and the information contained therein is likely to cause substantial harm to the competitive position of Bechtel Power Corporation because:
- a. The information contained in the documents identified in Attachment 1 consist of the design, fabrication, installation and testing relating to the repair of steam generators, the application of which provides a competitive advantage to Bechtel Power Corporation in the nuclear marketplace. Development of this information by Bechtel Power Corporation involved a substantial investment of effort and money.
 - b. The information contained in the documents identified in Attachment 1 cannot otherwise be duplicated by others without a substantial investment of effort and money by them.

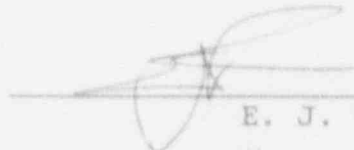
c. In order to acquire such information, another party would also incur considerable expense and inconvenience in developing the design information contained in the documents identified in Attachment 1.

d. The availability of such information to others would enable them to modify or create products without incurring significant development, engineering, quality assurance and other costs incurred by Bechtel Power Corporation.

e. The disclosure of the information may enable such parties to provide such services while avoiding the forgoing costs thereby significantly impairing the position of Bechtel Power Corporation in the nuclear marketplace.


9. Because of both the substantial investment of effort and money by Bechtel Power Corporation in conceiving and developing the information presented in the documents identified on Attachment 1 to this affidavit and Bechtel Power Corporation's expectation that this information will substantially enhance its competitive position in the nuclear industry, Bechtel Power Corporation has a rational basis for holding this information in confidence.

Further the Affiant sayeth not.




E. J. Reinsch

Subscribed and sworn to before me this 13th day of October, 1992.



Notary Public
My Commission expires: _____



NOTARY PUBLIC
7-13-94
STURGEON GENERAL'S OFFICE
STURGEON GENERAL'S OFFICE

AFFIDAVIT
ATTACHMENT 1

Documents which contain information "Proprietary" to Bechtel
Power Corporation

<u>Document Number</u>	<u>Document Type</u>	<u>Document Title</u>
N-9013-1-M-401	Drawing	Steam Generator Repair Project Removal and Replacement Drawing, Reactor Coolant System
N-9013-1-M-402	Drawing	Steam Generator Repair Project Removal and Replacement Drawing, Main Steam System
N-9013-1-M-403	Drawing	Steam Generator Repair Project Removal and Replacement Drawing, Feedwater System
N-9013-1-M-404 Sheet 1	Drawing	Steam Generator Repair Project Removal Drawing, SG Blowdown and Shell Drain Piping
N-9013-1-M-404 Sheet 2	Drawing	Steam Generator Repair Project Removal and Replacement Drawing, Sample System Piping
N-9013-1-M-405	Drawing	Steam Generator Repair Project Removal and Replacement Drawing, SG Transition Cone & Wrapper Plate
N-9013-1-M-406	Drawing	Steam Generator Repair Project Temporary Containment HVAC Modification for Smoke Removal

AFFIDAVIT
ATTACHMENT 1
(Continued)

Documents considered "Proprietary" by Bechtel Power Corporation

<u>Document Number</u>	<u>Document Type</u>	<u>Document Title</u>
N-9013-1-M-800	Drawing	Steam Generator Repair Project Steam Generator Vessel Closures for Removal and Storage
N-9013-1-M-801	Drawing	Steam Generator Level Instrumentation Condensate Pot and Lower Root Valve Details
N-9013-1-FK1A	Drawing	Steam Generator Repair Project Steam Generator Instrument Tubing Removal and Replacement Drawing
N-9013-1-FK1B	Drawing	Steam Generator Repair Project Steam Generator Instrument Tubing Removal and Replacement Drawing
N-9013-1-E-3500	Drawing	Steam Generator Repair Project LPM Accelerometer Mounting Bolt
21809-M-001(Q)	Specification	Technical Specification for Decontamination Services for Virginia Electric and Power Company, North Anna Power Station Unit 1, Steam Generator Repair Project