

# Bechtel Power Corporation

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October 31, 1984

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

Subject: Georgia Power Company  
Plant Vogtle - Units 1 and 2  
Bechtel Job 9510-001  
Application for Withholding Proprietary  
Information from Public Disclosure  
File: X7BC35  
Log No.: BO-78

Dear Mr. Denton:

Georgia Power Company has been requested by the NRC to provide certain information concerning structural design calculations. Included in the information to be provided are the sample calculations for evaluation of tornado load effects on structures. Those calculations are proprietary information of Bechtel Power Corporation. They contain trade secrets which, if publicly available, would substantially impair the competitive position of Bechtel Power Corporation in the industry.

Accordingly, this letter will serve as the application of Bechtel Power Corporation, as owner of the information, for an exemption from the public disclosure rules. This exemption is sought pursuant to 10 CFR 2.790 and is supported by the attached affidavit of Loren G. Hinkelman.

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Mr. H. R. Denton  
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Bechtel Power Corporation

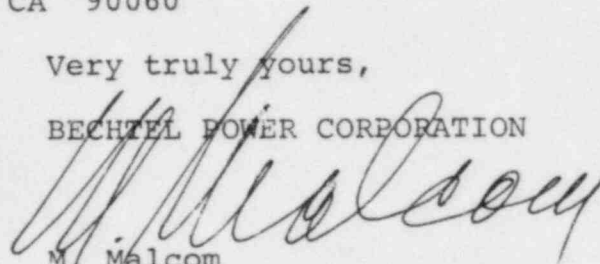
October 31, 1984

Please address inquiries or correspondence concerning this application to:

Mr. Martin Malcom  
Project Engineering Manager  
Bechtel Power Corporation  
Terminal Annex  
P. O. Box 60860  
Los Angeles, CA 90060

Very truly yours,

BECHTEL POWER CORPORATION



M. Malcom  
Project Engineering Manager  
Western Power Division

RAS/SJC/el

Attachment: Affidavit of Loren G. Hinkelman

xc: O. Batum w/o att.  
V-RMS w/att.  
J. A. Bailey (SCS) w/att.

State of California )  
                              )    ss  
County of Los Angeles)

AFFIDAVIT OF LOREN G. HINKELMAN

Comes now the affiant, Loren G. Hinkelman, and, being first duly sworn, deposes and says:

1. That I am a Vice President of Bechtel Power Corporation ("Bechtel") and General Manager of the Western Power Division of Bechtel.
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 delegated, by Bechtel, the function of reviewing the documents discussed herein and have been 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 that Georgia Power Company disclose certain documents concerning the Vogtle Electric Generating Plant.

5. That, based on my information and belief, the documents requested by the NRC are sample calculations of tornado load effects on structures. Bechtel prepared these calculations and has been requested by Georgia Power Company to provide them.
6. That the documents identified in Paragraph 5 are Bechtel documents.
7. That the documents identified in Paragraph 5 should not be publicly disclosed because they are Bechtel design documents disclosing Bechtel's means and methods for performing a portion of the design and construction of a nuclear power plant. As such:
  - a. The documents contain trade secrets of Bechtel.
  - b. The documents contain proprietary and confidential commercial information and data of Bechtel.
  - c. The documents contain 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 has been held in confidence by Bechtel.
- b. The information is of a type customarily held in confidence by Bechtel and there is a rational basis therefore 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 properly acquiring or duplicating the information which represents special applications of theoretical principles, complex analytical procedures and sophisticated design techniques.

*Loren G. Hinkelman*

Loren G. Hinkelman

Vice President

Bechtel Power Corporation

Subscribed and sworn to before me this 31st day  
of October, 1984.

*Joanne E. Henry*  
Notary Public

