

EXXON NUCLEAR COMPANY, Inc.

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December 31, 1984

JCC:177:84

Dr. Cecil O. Thomas, Chief
Standardization & Special Projects Branch
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: XN-NF-84-117(P), "Generic LOCA Break Spectrum Analysis; BWR 3 and 4 with Modified Low Pressure Coolant Injection Logic," December 1984.

Dear Dr. Thomas:

Enclosed for your information and review are twenty-two copies of the subject Exxon Nuclear licensing topical report. This report provides a determination of the limiting break configuration for BWR/3 and BWR/4 plants with modified Low Pressure Safety Injection logic. The Pennsylvania Power & Light Company will be referencing this report in their upcoming application for license amendment for the Susquehanna Steam Electric Station, Unit 1.

Exxon Nuclear Company considers information contained in the enclosed topical report to be proprietary. In accordance with the Commission's Regulation 10 CFR 2.790(b), the enclosed Affidavit executed by our G.F. Owsley provides the necessary information to support the withholding of this document from public disclosure.

In compliance with the Commission's Regulation 10 CFR 170.12(f), Exxon Nuclear's check in the amount of \$150.00 has been enclosed with Mr. William O. Miller's copy of this letter as the Special Project application fee for the subject topical report.

If you have any questions regarding this submission, please feel free to contact me, telephone (509) 375-8639.

Sincerely,

J.C. Chandler

J.C. Chandler, Lead Engineer
Reload Licensing Liason

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PDR TOPRP EMVEXXN
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cc: Mr. David Moran (NRC)
Mr. H.A. Barth (PP&L)
Mr. W. O. Miller (NRC)

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By DCD
w/out Check*

A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, Gerald F. Owsley, being duly sworn, hereby say and depose:

1. I am Manager, Reload Licensing Liaison, for Exxon Nuclear Company, Inc. ("ENC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with ENC's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the document XN-NF-84-117(P), entitled "Generic Break Spectrum Analysis for BWR 3 and 4 with Modified Low Pressure Coolant Injection Logic," referred to as "Document." Information contained in this Document has been classified by ENC as proprietary in accordance with the control system and policies established by ENC for the control and protection of information.

4. The document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by ENC and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as proprietary and confidential.

5. The Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document will not be disclosed or divulged.

6. The Document contains information which is vital to a competitive advantage of ENC and would be helpful to competitors of ENC when competing with ENC.

7. The information contained in the Document is considered to be proprietary by ENC because it reveals certain distinguishing aspects of BWR accident analysis methodology and results which secure competitive advantage to ENC for fuel design optimization and marketability, and includes information utilized by ENC in its business which affords ENC an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

8. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it extremely valuable insights into BWR accident analysis methodology and results and would result in substantial harm to the competitive position of ENC.

9. The Document contains proprietary information which is held in confidence by ENC and is not available in public sources.

10. In accordance with ENC's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside ENC only as required and under suitable agreement providing for non-disclosure and limited use of the information.

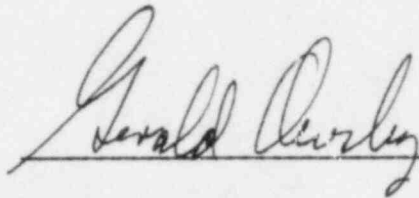
11. ENC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

12. This Document provides information which reveals BWR accident analysis methodology and results developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the BWR accident analysis methodology and results revealed in the Document. Assuming a competitor had available the same background data and incentives as ENC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ENC.

13. Based on my experience in the industry, I do not believe that the background data and incentives of ENC's competitors are sufficiently similar to the corresponding background data and incentives of ENC to reasonably expect such competitors would be in a position to duplicate ENC's proprietary information contained in the Document.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

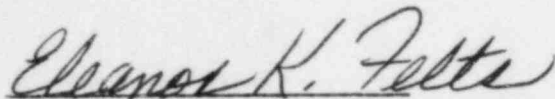
FURTHER AFFIANT SAYETH NOT.

A handwritten signature in cursive script, reading "Gerald A. Cusley", written over a horizontal line.

SWORN TO AND SUBSCRIBED

before me this 31 day of

December, 1984.

A handwritten signature in cursive script, reading "Eleanor K. Felts", written over a horizontal line.

NOTARY PUBLIC