

The Light company

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October 29, 1985
ST-HL-AE-1471
File No.: G9.17

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

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Submittal of the Proprietary Report Concerning
Reliability Analysis For ESF Load Sequencer

Dear Mr. Denton:

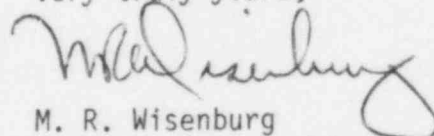
Please find enclosed GA Technologies report E-115-1243 (Rev. 2) entitled "Reliability Analysis Report for ESF Load Sequencer, South Texas Project." This report is being submitted to the NRC as our response to the recent Power Systems Branch Question 430.118N.

This submittal contains GA Technologies proprietary information. In conformance with the requirements of 10CFR Section 2.790 of the Commission's regulations, we are enclosing an application for withholding from public disclosure by the Commission and an appropriate affidavit. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission.

Correspondence with respect to the proprietary aspects of the GA Technologies affidavit should reference CAW-85-044 and be directed to J. H. Winso, Director of Engineering, Sorrento Electronics Division, P. O. Box 85688, San Diego, CA 92138.

If you should have any questions on this matter, please contact Mr. M. E. Powell at (713) 993-1328.

Very truly yours,



M. R. Wisenburg
Manager, Nuclear Licensing

JSP/yd

Attachments: (1) Application and Affidavit for Withholding
Reliability Analysis Report For ESF Load Sequencer,
South Texas Project

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cc:

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Washington, DC 20555

Advisory Committee on Reactor Safeguards
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Note: All copies without attachments, except as identified by (*)

W2/NRC3/r

Revised 9/25/85

APPLICATION AND AFFIDAVIT

I, J. H. Winso, do hereby depose:

1. I am a management official of GA Technologies Inc. (GA) and am authorized to execute this Application and Affidavit.
2. The attached document entitled:

GA Doc. E-115-1243 Rev. 2, "Reliability Analysis Report"

is treated as proprietary in accordance with the policies of GA and is handled and protected accordingly by GA.
3. This document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by GA and not made available to the public. I am aware that other companies regard information of the kind contained in this document as being proprietary and confidential.
4. This document contains information (including formulas, patterns, compilations, programs, devices, methods, techniques or processes) that derives independent economic value from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use. GA exerts efforts to maintain the secrecy of the information in the documents by controlling access, by entrusting copies only under written confidentiality agreements which forbid further disclosure and limit use by customers, and by withholding copies even from GA's libraries, all of which are reasonable efforts under the circumstances. Accordingly, the information is trade secret within the meaning of California Civil Code Section 3426.1 and is therefore property.
5. GA Technologies Inc. is allowing the attached document to be forwarded by Bechtel Energy Corporation to the Nuclear Regulatory Commission and is requesting that this document be withheld from disclosure per 10 CFR 2.790(a)(4). Further, in response to 10 CFR 2.790(b)(4):
 - (a) The document contains proprietary information, and trade secrets held in confidence (i.e., kept to itself) by GA Technologies Inc. This document has been made available to others outside of GA only as required for conducting business and under suitable agreements providing for non-disclosure and limited use of the information.
 - (b) If this document is transmitted to NRC it is expected to be received by the Commission in confidence.
 - (c) This document is not readily available through public or private sources.

(d) This document contains information (of a kind customarily withheld from others as a form of property) generated by GA Technologies Inc. at an expense that was incurred for the benefit of GA. Disclosure of this information could lead to benefit for others who have not incurred the burdens of its generation or its protection, nor shared in the cost.

The above statements are true and correct to the best of my knowledge.

GA TECHNOLOGIES INC., APPLICANT

By JH Winso 10/21/85
J. H. Winso, Director of Engineering
Sorrento Electronics Division

SWORN TO AND SUBSCRIBED before me this 21st day of October 1985.



Lorraine Rogers
Notary Public