220 Stoneridge Drive . Columbia, South Carolina 29210

February 22, 1988 RA-0069-8

Dr. J. Nelson Grace Regional Administrator, Region II U. S. Nuclear Regulatory Commission 101 Marietta Street, Suite 3100 Atlanta, GA 30303

Dear Dr. Grace:

Attached to this letter is an affidavit in reference to the <u>Semi-Annual Effluent</u> and <u>Waste Disposal Report for 1987</u> from South Carolina Electric and <u>Gas</u>. The affidavit covers the CNSI proprietary procedures submitted as part of that report and the portion of the report directly referencing the proprietary materials.

The procedures assure compliance with the regulatory requirements of 10 CFR Part 61.

If I can be of further assistance in this matter, please feel free to contact me.

Very truly yours,

CHEM-NUCLEAR SYSTEMS, INC.

William B. House

Director, Licensing

WBH:nhs

Attachment

c: D. A. Nauman, SCE&G J. M. Taylor, USNRC

> 8803030206 880229 PDR ADOCK 05000395

AFFIDAVIT SUBMITTED TO NUCLEAR REGULATORY COMMISSION
CONCERNING CONFIDENTIAL INFORMATION AND TRADE SECRETS
CONTAINED IN THE DEWATERING AND WASTE PROCESSING CONTROL PROCEDURES SUBMITTED
REFERENCE AS A PART OF THE SEMI-ANNUAL EFFLUENT AND WASTE DISPOSAL
REPORT FOR 1987 FROM SOUTH CAROLINA ELECTRIC AND GAS

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND

SS:

William B. House states as follows on behalf of Chem-Nuclear Systems, Inc.:

- 1. I am the Director of Licensing for Chem-Nuclear Systems, Inc.
- 2. I have reviewed and am familiar with the contents of the procedures listed below prepared by Chem-Nuclear Systems, Inc. (hereinafter "CNSI").
 - o FO-AD-004 Operating Guidelines For Use of Fiberglass Reinforced Plastic High-Integrity Containers, Rev. J.
 - O FO-OP-009 Dewatering Procedure for 76-Inch Dia. Pressure
 Demineralizer Containing Ion Exchange Resins 0.5%
 Free-Standing Water, Rev. D.
 - o FO-OP-O22 Ecodex Pre-Coat/Powdex/Solka-Floc/Diatomaceous Earth Dewatering Procedure for CNSI 14-195 or Smaller Liners, Pev. C.
 - o FO-OP-C25 Lewatering Procedure For CNSI 24-Inch Diameter Pressure Vessels, Rev. A.

These procedures are hereinafter called "the procedures."

- 3. South Carolina Electric & Gas (hereinafter "SCE&G") has submitted the procedures to the Nuclear Regulatory Commission containing proprietary information which should be withheld from public disclosure.
- 4. CNSI, as part of its radioactive waste disposal services, provides a variety of dewatering containers, dewatering systems and procedures which in most respects are unique. Detailed information concerning the design operation and certification data has always been held in confidence by CNSI. The specific container internals, the types of filter arrays, and the procedures used to certify the total system are considered confidential information that include company trade secrets incorporated into such designs and processes.

Employees of CNSI sign an agreement regarding protection of trade secret information at the time of entering company employment and the data contained in the proprietary version of the procedures being submitted to the Commission by SCE&G contains the type of information CNSI regards as protected and of the type not to be disclosed to unauthorized persons, including especially competitors, by present or former employees.

5. CNSI has obtained a competitive edge in the field of dewatering aqueous low-level radioactive waste streams because of its extensive experience in this field and financial commitment to research, development and design concerning container components and certifications. CNSI dewatering systems, container design, procedures, and certifications are presently superior to equipment and processes used by competitors for similar processes and this superiority is the basis on which procedure details are being withheld.

The information contained in the procedures is not available from public sources.

6. Public disclosure of the procedures would cause substantial harm to the competitive position of CNSI. The Company has invested approximately one million dollars over the last several years in engineering salaries and testing programs and has spent over two hundred fifty thousand dollars approving this system and conducting certification testing. Additionally, the Company has nearly one-half million dollars in capital investment for operating systems supporting the procedures. Competitors of CNSI would have great difficulty in duplicating the operation developed by CNSI, due not only to the financial investment of the Company, but also to the unique skills, talents and expertise of CNSI employees.

William B. House
Director, Licensing

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND

SS:

On this 22th day of February, 1988, before me, a Notary Public in and for the State of South Carolina, duly commissioned and sworn, personally appeared William B. House, to me known to be the Director of Licensing for Chem-Nuclear Systems, Inc., and on oath stated that he was authorized to make this affidavit on behalf of the corporation.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal the day and year first above written.

Sharra L. Rollinson My Commission Expires March 11, 1990

Notary Public, State of South Carolina

ATTACHMENTI

V. C. SUMMER NUCLEAR STATION

PROCESS CONTROL PROGRAM

REVISION 6

CHANGE D