

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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August 30, 1988

Docket No. 50-336
813006

Re: 10CFR50.90

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Fuel Design Report for Cycle 10 Reload

In a letter dated June 3, 1988,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) submitted to the NRC Staff a proposed schedule for various reports and analyses supportive of Millstone Unit No. 2's Cycle 10 reload. The Cycle 10 start-up is currently scheduled for March 1989.

In support of the proposed schedule, NNECO hereby submits, as Attachment 1, the Fuel Design Report which describes the fuel assembly design for Millstone Unit No. 2, Cycle 10. Information in this report includes a description of the fuel design, analytical basis, design criteria, drawings and results of the fuel design analysis. Operating experiences with fuel having similar design characteristics are also included.

As Attachment 1 contains information proprietary to Advanced Nuclear Fuels, Inc. (ANF), it is supported by the enclosed affidavit signed by ANF, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the NRC Staff and addresses with specificity the considerations listed in 10CFR2.790(b)(4). Accordingly, it is respectfully requested that the information which is proprietary to ANF be withheld from public disclosure in accordance with 10CFR2.790.

(1) E. J. Mrocza letter to U. S. Nuclear Regulatory Commission, dated June 3, 1988, "Millstone Nuclear Power Station, Unit No. 2, Cycle 10 Reload License Amendment Schedule."

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Please contact us if you have any questions regarding this information.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Mroczka
Senior Vice President

cc: W. T. Russell, Region I Administrator
D. H. Jaffe, NRC Project Manager, Millstone Unit No. 2 and 3
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3
P. Habighorst, Resident Inspector, Millstone Unit No. 2

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Attachment 1
Fuel Design Report for Cycle 10 Reload

August 30, 1988

A F F I D A V I T

STATE OF WASHINGTON)
)
COUNTY OF BENTON) ss.

I, H. E. Williamson being duly sworn, hereby say and depose:

1. I am Manager, Licensing and Safety Engineering, for Advanced Nuclear Fuels Corporation, ("ANF"), and as such I am authorized to execute this Affidavit.

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

3. I am familiar with the Document ANF-88-088(P) entitled "Design Report for Millstone Point Unit 2 Reload ANF-1," referred to as "Document." Information contained in this Document has been classified by ANF as proprietary in accordance with the control system and policies established by ANF 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 ANF 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 ANF and would be helpful to competitors of ANF when competing with ANF.

7. The information contained in the Document is considered to be proprietary by ANF because it reveals certain distinguishing aspects of PWR fuel design licensing methodology and criteria which secure competitive advantage to ANF for fuel design optimization and marketability, and includes information utilized by ANF in its business which affords ANF 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 PWR fuel design licensing methodology and criteria and would result in substantial harm to the competitive position of ANF.

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

10. In accordance with ANF'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 ANF only as required and under suitable agreement providing for nondisclosure and limited use of the information.

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

12. Information in this Document provides insight into PWR fuel design licensing methodology and criteria developed by ANF. ANF has invested significant resources in developing the PWR fuel design licensing methodology and criteria as well as the strategy for this application. Assuming a competitor had available the same background data and incentives as ANF, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ANF.

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

FURTHER AFFIANT SAYETH NOT.

D. E. Williams

SWORN TO AND SUBSCRIBED

before me this 9th day of

August, 1988.

Floria R. Fitzgerald

NOTARY PUBLIC