

Bechtel Power Corporation

Engineers — Constructors

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October 29, 1986

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 & 2
Bechtel Job 9510
Application for Withholding Proprietary
Information from Public Disclosure
File: X7BC35
Log: BO 228

Dear Mr. Denton:

Georgia Power Company has been requested by the NRC to provide certain information concerning the verification of Bechtel computer code "FLUD". The calculational methods used in FLUD are proprietary information of Bechtel Power Corporation. It contains 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 Robert H. Stone.

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Bechtel Power Corporation

October 29, 1986

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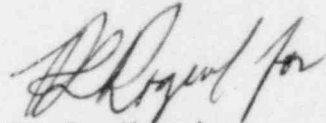
Please address inquiries or correspondence concerning this
application to:

Mr. Fred B. Marsh
Project Engineering Manager
Bechtel Power Corporation
Terminal Annex
Los Angeles, CA 90060

If you have any questions, please contact us.

Very truly yours,

BECHTEL POWER CORPORATION



F. B. Marsh
Project Engineering Manager

JP/SJC/mc

Attachment: Affidavit of Robert H. Stone

State of California)
) ss
County of Los Angeles)

AFFIDAVIT OF ROBERT H. STONE

Robert H. Stone, being first duly sworn, deposes and says:

1. That I am a Vice President of Bechtel Power Corporation ("Bechtel").
2. That, except for the matters expressly stated to be on 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 am 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 production of certain documents by Bechtel to be used by NRC personnel.
5. That, based on my information and belief, the following documents are among the documents sought:

FLUD (NE017) Thermofluid Dynamics for a System of Interconnected Compartments - Extracts from Theoretical Basis Report, Revision 1, April, 1981 - pages 5-7 through 5-9.

Input Data and Profiles from Calculation X6CJH.28.3, "Equipment Qualification Inside Main Steam Isolation Valve Area in Auxiliary and Control buildings with Superheated Steam Blowdown".
6. That the documents identified in Paragraph 5 are Bechtel documents.
7. That the documents identified in Paragraph 5 should not be subject to public inspection and copying because they are Bechtel's procedure describing Bechtel's means and methods for performing calculations relating to the design and construction of nuclear power plants. 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 is held in confidence by Bechtel.
 - b. The information is of a type customarily held in confidence by Bechtel and there is a rational basis for holding the information in confidence 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.

9. For the reasons set forth in this affidavit, Bechtel requests that the documents listed in paragraph 5 be designated as exempt from disclosure pursuant to 10 CFR 2.790.

Robert H. Stone

Robert H. Stone
Vice President
Bechtel Power Corporation

STATE OF CALIFORNIA)
) ss
County of Los Angeles)



Subscribed and sworn to before me this 28th day
of OCTOBER, 1986.

Marie L. Amendola
Notary Public