



**SYSTEM ENERGY
RESOURCES, INC.**

A Middle South Utilities Company

WILLIAM T. COTLE
Vice President
Nuclear Operations

February 24, 1989

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Proprietary Portion of Response to
RAI in Support of Core Stability
Proposed Amendment
AECM-89/0041

References: AECM-89/0039; Response to RAI in Support of Proposed Amendment on
Core Stability

As discussed in above referenced letter, portions contained in Attachment 2 to that letter are considered proprietary by Advanced Nuclear Fuels (ANF). The proprietary portions of Attachment 2 are contained herein and should be withheld from public disclosure in accordance with 10CFR2.790 and 10CFR9.5. Enclosed is an Affidavit by ANF regarding the proprietary nature of this information.

If you have any questions, please advise.

Yours truly,

WTC:wjb

Attachments: Proprietary portion of Attachment 2 to AECM-89/0039

Enclosure: Affidavit from ANF on Statement of Proprietary Information

cc: (See Next Page)

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A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

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 attachment to the AECM-89-0041 document entitled "Response to RAI in Support of Core Stability Proposed Ammendment", 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 BWR design and licensing methodology 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 valuable insights into BWR design and licensing methodology 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 BWR design and licensing methodology developed by ANF. ANF has invested significant resources in developing the BWR design and licensing methodology 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.

A. E. Williamson

SWORN TO AND SUBSCRIBED

before me this 22nd day of

February, ~~1988~~ 1989.

Shannon C. Cross

NOTARY PUBLIC