

**ADVANCED NUCLEAR FUELS CORPORATION**

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RAC:031:88  
May 11, 1989

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

Gentlemen:

Subject: Transmittal of ANF-89-014(P)

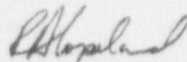
Reference: ANF-89-014(P), "Generic Mechanical Design for Advanced Nuclear Fuels 9x9-IX and 9x9-9X BWR Reload Fuel", Advanced Nuclear Fuels Corp., May 1989.

Enclosed are twenty-five copies of the reference proprietary topical report. This report provides the generic mechanical design analyses for the 9x9-IX and 9x9-9X BWR fuel designs.

ANF considers the information contained in the reference topical report to be proprietary. In accordance with the Commission's Regulation 10 CFR 2.790(b), the enclosed affidavit executed by Mr. H. E. Williamson of ANF provides the necessary information to support withholding of this topical report from public disclosure.

If there are any questions, or if further information is needed, please contact me at (509) 375-8290.

Sincerely yours,



R. A. Copeland  
Manager, Reload Licensing

/scg

cc: Mr. M. W. Hodges (NRC)

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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 topical report ANF-89-014(P) entitled "Generic Mechanical Design for Advanced Nuclear Fuels 9x9-IX and 9x9-9X BWR Reload Fuel", 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 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 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.

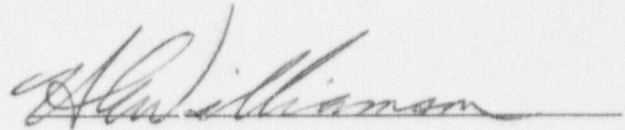
12. Information in this Document provides insight into BWR licensing methodology developed by ANF. ANF has invested significant resources in developing the BWR licensing methodology as well as the strategy for this application. Assuming a competitor had available the same background



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.



SUBSCRIBED before me this 12<sup>th</sup>  
day of May, 1989.

Shannon C. Gross  
Shannon C. Gross 8812284  
NOTARY PUBLIC, STATE OF WASHINGTON  
COMMISSION EXPIRES NOVEMBER 21, 1992