



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

October 22, 1999
NOC-AE-000682
File No.: G04
STI: 30973518
10CFR2.790

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Application for Withholding of Information from Public Disclosure

Reference: Letter from J. J. Sheppard to NRC Document Control Desk, "Request for Exemption to Exclude Certain Components from the Scope of Special Treatment Requirements Required by Regulation," dated July 13, 1999 (NOC-AE-000518)

Attached for your information and use in reviewing the exemption request, referenced above, are copies of the South Texas Project Risk Significance Basis Documents (RSBDs) for the Safety Injection System and the Electrical Auxiliary Building Control Room HVAC System. Nuclear Regulatory Commission representatives requested these items during a visit to the South Texas Project on October 5 and 6, 1999. By this letter, South Texas Nuclear Operating Company (STPNOC) requests that the RSBDs and information they contain be withheld from public disclosure under the provisions of 10 CFR 2.790(a)(4). In accordance with 10 CFR 2.790(b), the specific information and bases for withholding are detailed in the enclosed affidavit.

STPNOC believes that the enclosed affidavit sets forth sufficient grounds for withholding the identified information from public disclosure. In the event that the Nuclear Regulatory Commission does not agree, STPNOC specifically requests that it be so notified, with a statement of the reasons, in accordance with 10 CFR 2.790(c).

Please contact Scott Head at (361) 972-7136 if you have any questions or require additional information.

J. J. Sheppard
Vice President,
Engineering & Technical Services

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- Attachments: 1) STP Risk Significance Basis Document, Safety Injection System
2) STP Risk Significance Basis Document, Electrical Auxiliary Building and Control Room HVAC System

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cc:

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)
)
STP Nuclear Operating Company, et al.,) Docket Nos. STN 50-498
) STN 50-499
South Texas Project)
Units 1 and 2)

AFFIDAVIT

I, J. J. Sheppard, being duly sworn, hereby depose and say that I am Vice President, Engineering & Technical Services of STP Nuclear Operating Company; that I am duly authorized to sign and file with the Nuclear Regulatory Commission this Affidavit on behalf of the STP Nuclear Operating Company (STPNOC).

Further, I am authorized to apply for the withholding of information from disclosure. Specifically, STPNOC requests that the information contained in the South Texas Project Risk Significance Basis Documents (RSBDs) for the Safety Injection System and the Electrical Auxiliary Building Control Room HVAC System be withheld from public disclosure under the provisions of 10 CFR 2.790(a)(4). In this connection, I have personal knowledge of the criteria utilized by STPNOC in designating information as a trade secret or as confidential commercial information.

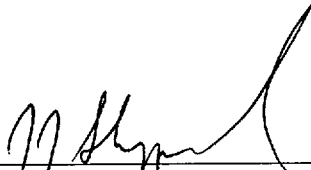
The RSBDs present the details of the STP risk significance determination process in a step-by-step fashion. They are based upon and integrate information and analytical techniques developed by STPNOC as the result of an extensive effort extending over a number of years at the expenditure of considerable station resources.

The integrated, risk significance determination process detailed in the RSBDs can serve as the basis for exemptions from current regulatory requirements resulting in significant cost savings, estimated at more than \$2 million per year for the South Texas Project. The release of this information could, thus, result in the loss of an existing or potential competitive advantage for STPNOC, and would eliminate the potential for the South Texas Project to be compensated by others making this information available.

The following additional information is provided in accordance with 10 CFR 2.790(b)(4).

- a. The information contained in the RSBDs -- in the form of an integrated, detailed, risk determination product -- has been held in confidence by STPNOC.
- b. The information is of a type customarily held in confidence by STPNOC, on a rational basis, and not customarily disclosed to the public.

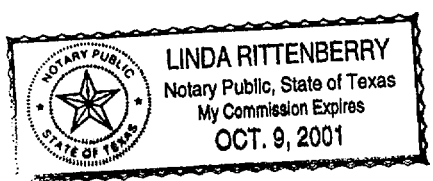
- c. The information is being transmitted to the Nuclear Regulatory Commission (NRC) in confidence.
- d. The information is not available in public sources.
- e. Public disclosure of information is likely to cause substantial harm to the competitive position of STPNOC in that it would enhance the ability of competitors to implement a similar process for commercial power reactors without incurring commensurate expenses. Public disclosure of the information would enable others to use the information to meet NRC requirements without purchasing the right to use the information. The development of the technology described in this information is the result of an extensive effort by STPNOC extending over a number of years at the cost of considerable station resources. In order for competitors to duplicate this information, similar technical programs would have to be executed and a significant manpower effort, having the requisite talent and experience, would have to be expended for developing and testing the methods presented in the STP Manual. The information is therefore of considerable commercial value.
- f. Copies of the RSBDs are in the U. S. Copyright Office in the Library of Congress, however, reproduction of the documents is not allowed.

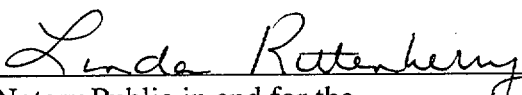


 J. J. Sheppard
 Vice President
 Engineering & Technical Services

STATE OF TEXAS)
)
 COUNTY OF MATAGORDA)

22nd day of October, 1999. Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this





 Notary Public in and for the
 State of Texas