

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8201290019 DOC. DATE: 82/01/25 NOTARIZED: NO DOCKET #
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362
 AUTH. NAME AUTHOR AFFILIATION
 DIETCH, R. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 EISENGHUT, D.G. Division of Licensing

SEE RPI

SUBJECT: Forwards "Independent Verification of San Onofre Nuclear
 Generating Station Units 2 & 3 Seismic Design & QA Program
 Effectiveness," interim rept.

DISTRIBUTION CODE: B001S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 1457
 TITLE: PSAR/FSAR AMDTS and Related Correspondence

NOTES: L Chandler: all FSAR & ER amends. 1 cy: J Hanchett (Region V). 05000361
 D Scaletti: 1 cy all envir info.
 L Chandler: all FSAR & ER amends. 1 cy: J Hanchett (Region V). 05000362
 D Scaletti: 1 cy all envir info.

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INTERNAL:	ELD	1 0	IE	06 3 3					
	IE/DEP/EPDB 35	1 1	IE/DEP/EPLB 36	3 3					
	MPA	1 0	NRR/DE/CEB 11	1 1					
	NRR/DE/eqb 13	3 3	NRR/DE/GB 28	2 2					
	NRR/DE/HGEB 30	2 2	NRR/DE/MEB 18	1 1					
	NRR/DE/MTEB 17	1 1	NRR/DE/QAB 21	1 1					
	NRR/DE/SAB 24	1 1	NRR/DE/SEB 25	1 1					
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	NRR/DHFS/OLB 34	1 1	NRR/DHFS/PTRB20	1 1					
	NRR/DSI/AEB 26	1 1	NRR/DSI/ASB 27	1 1					
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	<u>REG FILE</u> 04	1 1							
EXTERNAL:	ACRS 41	16 16	BNL (AMDTS ONLY)	1 1					
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	NRC PDR 02	1 1	NSIC 05	1 1					
	NTIS	1 1							

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64 59
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TORREY PINES TECHNOLOGY

P.O. Box 81608
San Diego, California 92138
Telephone: (714) 455-2654

GEORGE L. WESSMAN
Director

January 25, 1982

Mr. D. J. Fogarty
Executive Vice President
SOUTHERN CALIFORNIA EDISON COMPANY
P. O. Box 800
Rosemead, California 91770

Dear Mr. Fogarty:

Enclosed are fifty copies of the following report:

GA-C16642 - Interim Report
Independent Verification of
San Onofre Nuclear Generation Station Units 2&3
Seismic Design and Quality Assurance
Program Effectiveness 1/25/82

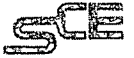
Sincerely,

George L. Wessman
Project Manager

Enclosures

cc: J. Adrian

Southern California Edison Company



P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

ROBERT DIETCH

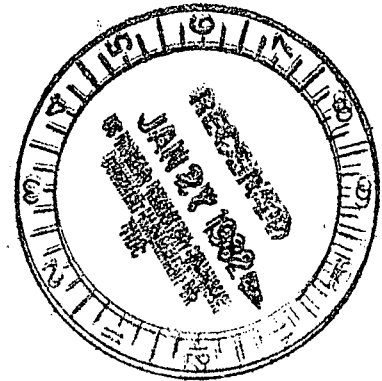
VICE PRESIDENT

January 25, 1982

TELEPHONE

213-572-4144

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

By letter dated December 29, 1981, Southern California Edison Company (SCE) transmitted to the NRC documents describing the independent verification of the San Onofre Units 2 and 3 (SONGS 2&3) seismic design and committed to provide to the NRC interim and final reports concerning this work.

As of the issuance of that letter, the schedule for issuance of the Interim Report by General Atomic Company was January 8, 1982. However, because of (1) the NRC audit which was conducted during the week of January 4, 1982 and (2) expansion of the scope of the report as requested by the NRC, issuance of the Interim Report was rescheduled to January 25, 1982.

Accordingly, seven copies (NRC Mail Code B028) of the report entitled "Interim Report-Independent Verification of San Onofre Nuclear Generating Station Units 2&3 Seismic Design and Quality Assurance Program Effectiveness" dated January 25, 1982 are transmitted as received from GA on this date.

If you have any questions concerning this report, please contact me.

Very truly yours,

Robert Dietch

Enclosures

cc: NRC Region V
R. H. Engelken (w encl)
H. Rood (To be opened by addressee only, with ten copies of enclosure)

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PDR ADOCK 05000361
A PDR



NRC-SONGS

Box

NRC_SONGS_0065

Accession

8201290475

REGULATORY INFORMATION DISTRIBUTION SYSTEM (GRIDS)

ACCESSION NBR: 8201290475 DOC. DATE: 82/01/22 NOTARIZED: NO DOCKET #
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361
 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362
 AUTH. NAME AUTHOR AFFILIATION
 BASKIN, K. P. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MIRAGLIA, F. Licensing Branch 3

SUBJECT: Forwards proprietary & nonproprietary versions of
 (EN-160(S), Revision 1, CEN-184(S), Revision 2, CEN-176(S),
 Revision 1 & CEN-173(S), Revision 2, re thermal-hydraulic design. Proprietary repts available in CF only. W/affidavits. *SEE Subject FILES*

DISTRIBUTION CODE: PB01S COPIES RECEIVED: LTR 1 ENCL 3 SIZE: 23+292
 TITLE: Proprietary Review Distribution - Pre OL

NOTES: L Chandler: all FSAR & ER amends. 1 cy: J Hanchett (Region V). 05000361
 D Scaletti: 1 cy all envir info.
 L Chandler: all FSAR & ER amends. 1 cy: J Hanchett (Region V). 05000362
 D Scaletti: 1 cy all envir info.

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EXTERNAL:	ACRS NRC PDR	16 0 1 0	LPDR NTIS	1 0 1 0

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Southern California Edison Company



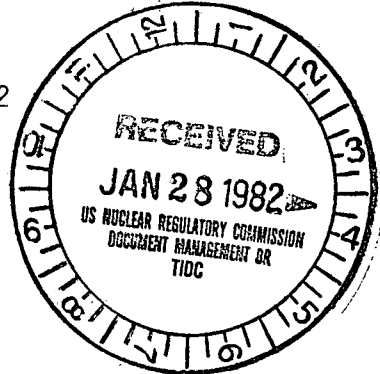
P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
SAFETY, AND LICENSING

TELEPHONE
(213) 572-1401

January 22, 1982

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

In connection with the thermal-hydraulic design of San Onofre Units 2 and 3, SCE has held numerous meetings and discussions with the NRC Core Performance Branch (CPB) during the past several months. Revisions to the San Onofre Units 2 and 3 thermal-hydraulic documentation were required to reflect the clarification requested by the NRC CPB. The revisions were previously provided to the NRC CPB and were subsequently approved by them.

The purpose of this letter is to formally document transmittal of the revised thermal-hydraulic design documentation for San Onofre Units 2 and 3 to the NRC. Accordingly please find enclosed three (3) copies each of the following revised proprietary Combustion Engineering documents, including affidavits setting forth the basis on which the information may be withheld from public disclosure by the Commission and addressing specifically the considerations listed in 10 CFR 2.790 (b) of the Commission's regulations:

- Enclosure 1 - CEN-160(S)-P, REV. 1-P, CETOP-D Code Structure and Modeling Methods for San Onofre Nuclear Generating Station Units 2 and 3. (Copy Nos. 003, 004 and 005)
- Enclosure 2 - CEN-184(S)-P, REV. 2-P, Responses to Questions on Documents Supporting SONGS 2 License Submittal. (Copy Nos. 003, 004 and 005)
- Enclosure 3 - CEN-176(S)-P, REV. 01, CPC/CEAC System Phase I Software Verification Test Report. (Copy Nos. 003, 004 and 005)
- Enclosure 4 - CEN-173(S)-P, REV. 02, CPC/CEAC System Phase II Software Verification Test Report. (Copy Nos. 00013, 00014 and 00015)

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A PDR

It is respectfully requested that the above information, which is proprietary to Combustion Engineering, Inc., be withheld from public disclosure in accordance with 10 CFR 2.790(b) of the Commission's regulations. If you should have any question concerning the proprietary nature of the material transmitted herewith, please address these questions directly to:

Mr. A. E. Scherer
Director of Licensing (9438-1922)
Combustion Engineering
1000 Prospect Hill Road
Windsor, Connecticut 06095

It is also requested that you provide a copy of any questions concerning the proprietary nature of this submittal to SCE and SDG&E.

Also enclosed are five (5) copies each of the following nonproprietary versions of the above documentation in order to satisfy the requirements for transmittal of proprietary information to the NRC:

- Enclosure 5 - CEN-160(S)-NP, REV. 1-NP, CETOP-D Code Structure and Modeling Methods for San Onofre Nuclear Generating Station Units 2 and 3.
- Enclosure 6 - CEN-184(S)-NP, REV. 2-NP, Responses to Question on Documents Supporting SONGS 2 License Submittal.
- Enclosure 7 - CEN-176(S)-NP, REV. 01, CPC/CEAC System Phase I Software Verification Test Report.
- Enclosure 8 - CEN-173(S)-NP, REV. 02, CPC/CEAC System Phase II Software Verification Test Report.

The enclosed documentation reflects revisions requested and previously approved by the NRC CPB and fulfills all documentation requirements relative to the thermal-hydraulic design of San Onofre Units 2 and 3.

If you have any questions or comments concerning this matter, please contact me.

Very truly yours,

VP Bushan

Enclosures

ENCLOSURE 1

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, P. L. McGill depose and say that I am the Vice President, Commercial of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the application of Southern California Edison Co. and San Diego Gas and Electric Co., for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

CEN - 160(S) - P, Revision 1-P, CETOP - D Code Structure and Modelling
Methods for San Onofre Nuclear Generating Stations Units 2 and 3.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure are the C-E thermal margin analysis methodology and thermal hydraulic characteristics of C-E cores, which is owned and has been held in confidence by Combustion Engineering.

2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a substantial competitive advantage to Combustion Engineering.

3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F.M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject documents herein are proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:

a. A similar product is manufactured and sold by major pressurized water reactors competitors of Combustion Engineering.

b. Development of this information by C-E required thousands of manhours of effort and hundreds of thousands of dollars. To the best of my knowledge and belief a competitor would have to undergo similar expense in generating equivalent information.

c. In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development of methods for the statistical combination of uncertainties in thermal margin analysis.

d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

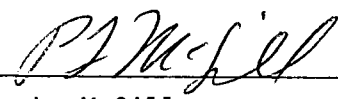
e. The information consists of the CE thermal margin analysis and the thermal hydraulic characteristics of CE cores, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included.

The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

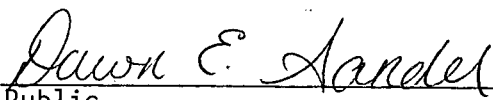
Further the deponent sayeth not.



P. L. McGill
Vice President
Commercial

Sworn to before me

this 25th day of September, 1981



Notary Public

DAWN E. SANDER, NOTARY PUBLIC
State of Connecticut No. 61536
Commission Expires March 31, 1986

ENCLOSURE 2

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, P. L. McGill depose and say that I am the Vice President, Commercial of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the application of Southern California Edison Company, for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

CEN-184(S) - P, Revision 2 - P, Response to Questions on Documents
Supporting SONGS 2 License Submittal.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure are the sensitivity analysis results of the TORC/CE-1 methodology and the CETOP methodology as well as measurements and algorithm uncertainties used in the Reactor Protection System, which is owned and has been held in confidence by Combustion Engineering.

2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a substantial competitive advantage to Combustion Engineering.

3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F.M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject documents herein are proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:

a. A similar product is manufactured and sold by major pressurized water reactors competitors of Combustion Engineering.

b. Development of this information by C-E required hundreds of manhours of effort and tens of thousands of dollars. To the best of my knowledge and belief a competitor would have to undergo similar expense in generating equivalent information.

c. In order to acquire such information, a competitor would also require considerable time and inconvenience related to the analysis of the TORC/CE-1 and CETOP methodologies as well as development of the measurement and algorithm uncertainties used in the Reactor Protection System.

d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

e. The information consists of the sensitivity analysis results of the TORC/CE-1 methodology and the CETOP methodology as well as measurements and algorithm uncertainties used in the Reactor Protection System, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included.

The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

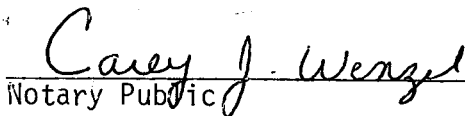
g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.



P. L. McGill
Vice President
Commercial

Sworn to before me
this 7th day of December, 1981


Notary Public

CAREY J. WENZEL, NOTARY PUBLIC
State of Connecticut No. 59962
Commission Expires March 31, 1985

ENCLOSURE 3

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, A. E. Scherer depose and say that I am the Director, Nuclear Licensing of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the application of Southern California Edison Co. and San Diego Gas and Electric Co. for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

CEN-176(S)-P, Rev. 01, CPC/CEAC Systems Phase I Software Verification Test Report, November, 1981.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure are the CPC/CEAC System Phase I Software Verification Test Hardware Configuration, Test Apparatus and Test results, which is owned and has been held in confidence by Combustion Engineering.

2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a substantial competitive advantage to Combustion Engineering.

3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F.M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject documents herein are proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:

a. A similar product is manufactured and sold by major pressurized water reactors competitors of Combustion Engineering.

b. Development of this information by C-E required thousands of manhours of effort and hundreds of thousands of dollars. To the best of my knowledge and belief a competitor would have to undergo similar expense in generating equivalent information.

c. In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development of test methods for software verification.

d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

e. The information consists of detailed descriptions of the CPC/CEAC System Phase I Software Verification Test Hardware configuration, Test Apparatus and Test results, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included.

The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

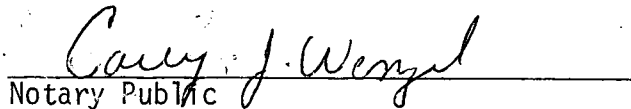
Further the deponent sayeth not.



A. E. Scherer
Director
Nuclear Licensing

Sworn to before me

this 10th day of November, 1981


Notary Public

CAREY J. WENZEL, NOTARY PUBLIC
State of Connecticut No. 59962
Commission Expires March 31, 1985

ENCLOSURE 4

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, P. L. McGill depose and say that I am the Vice President, Commercial of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the application of Southern California Edison Co. for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

CEN-173(S) - P, CPC/CEAC Systems Phase II Software Verification Test Report, Revision 02, November, 1981.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure are detailed descriptions of the testing performed and quantitative data and evaluation of the tests on the Core Protection Calculator and Control Element Assembly Calculator System Software and test acceptance criteria, which is owned and has been held in confidence by Combustion Engineering.

2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a substantial competitive advantage to Combustion Engineering.

3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F.M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject documents herein are proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:

a. A similar product is manufactured and sold by major pressurized water reactors competitors of Combustion Engineering.

b. Development of this information by C-E required tens of thousands of manhours of effort and hundreds of thousands of dollars. To the best of my knowledge and belief a competitor would have to undergo similar expense in generating equivalent information.

c. In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development of test methods for Core Protection Calculator and Control Element Assembly Calculator System Software.

d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

e. The information consists of detailed descriptions of the testing performed and quantitative data and evaluation of the tests and test acceptance criteria, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included.

The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

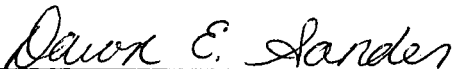
Further the deponent sayeth not.



P. L. McGill
Vice President
Commercial


Sworn to before me

this 25th day of November, 1981



Notary Public

DAWN E. SANDER, NOTARY PUBLIC
State of Connecticut No. 61536
Commission Expires March 31, 1986



ENCLOSURE 5