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 AUTH. NAME AUTHOR AFFILIATION
 BASKIN, K.P. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MIRAGLIA, F. Licensing Branch 3

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SUBJECT: Forwards Topical Rept 4313-01354-01-NP, "Cement Solidification Sys." Sys designed to process low level, liquid radwaste.

DISTRIBUTION CODE: 8001S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3+33
 TITLE: PSAR/FSAR AMDTS and Related Correspondence

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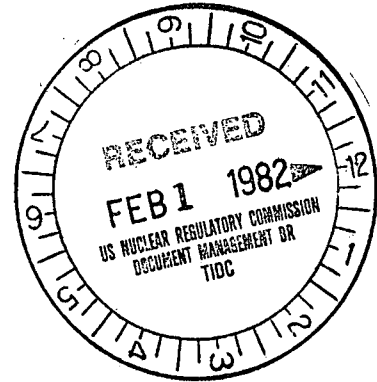
P. O. BOX 800
2244 WALNUT GROVE AVENUE
ROSEMEAD, CALIFORNIA 91770

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

January 29, 1982

TELEPHONE
(213) 572-1401

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

Reference is made to my letter to you dated November 10, 1981 which enclosed copies of the Process Control Program for radwaste solidification units supplied by Chem-Nuclear Systems, Inc. (CNSI). The CNSI CEMENT SOLIDIFICATION SYSTEM is designed to process low-level, liquid radioactive waste.

Waste solidification is accomplished in accordance with the Process Control Program. The program is designed to ensure each batch of radioactive waste received by the process unit is capable of being solidified into a monolithic solid having essentially no free water.

Enclosed with this letter are seven (7) copies (NRC Mail Code B028) of Topical Report, CNSI CEMENT SOLIDIFICATION SYSTEM, Document No. 4313-01354-01-NP. The topical report describes the design and operation of the CNSI CEMENT SOLIDIFICATION SYSTEM. A discussion of individual issues which relate to safe operation of a mobile unit at a customer site is also included. The report is intended to provide the Nuclear Regulatory Commission with sufficient information to evaluate CNSI's CEMENT SOLIDIFICATION SYSTEM.

The Process Control Program, enclosed with the November 10, 1981 letter, is designed to establish a set of process parameters which provide reasonable assurance of complete solidification of low-level radioactive waste. The program consists of instructions for sample collection and analysis for the determination of specific solidification process parameters. Acceptance criteria and program variations are also included.

The Process Control Program, as submitted, is Appendix A of the subject CNSI Topical Report. The Process Control Program should be reviewed in conjunction with the Topical Report.

If you have any questions concerning these matters, please call me.

8202020429 820129
PDR ADOCK 05000361
A PDR

Very truly yours,

K. P. Baskin

Boo/ 5 1/1

Enclosures

AFFIDAVIT SUBMITTED TO NUCLEAR REGULATORY
COMMISSION CONCERNING CONFIDENTIAL INFORMATION
AND TRADE SECRETS CONTAINED IN CHEM-NUCLEAR
SYSTEMS, INC., CEMENT SOLIDIFICATION
TOPICAL REPORT

STATE OF WASHINGTON

COUNTY OF KING

} ss:
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David G. Ebenhack states as follows on behalf of Chem-Nuclear Systems, Inc.:

1. I am the Director of Regulatory Affairs for Chem-Nuclear Systems, Inc.

2. I have reviewed and am familiar with the contents of the report prepared by Chem-Nuclear Systems, Inc., dated November 9, 1981, and entitled "CNSI Cement Solidification System Topical Report" (hereinafter "the Report").

3. Chem-Nuclear Systems, Inc. (hereinafter "CNSI") has submitted sixty copies of the Report to the Nuclear Regulatory Commission. Twenty copies of such report contain proprietary information which should be withheld from public disclosure. The other forty copies of the Report furnished to the Commission do not contain proprietary information, as trade secret information and privileged commercial data have been removed from these copies so as to make them available for such public disclosure as may be requested.

4. CNSI, as part of its radioactive waste disposal services, provides a cement solidification unit which in many respects is a system unique to CNSI. Detailed information concerning the design and operation of the cement solidification system has always been held in confidence by CNSI. The engineering design for the unit, and the process used in mixing and solidifying liquid radioactive waste is considered confidential information that includes Company trade secrets incorporated into such design and processes, which confidential information is deleted from the forty copies of the abbreviated CNSI Report furnished to the Commission and available for public disclosure.

Employees of CNSI sign an agreement regarding protection of trade secret information at the time of entering Company employment, and the data contained in the proprietary version of the Report submitted to the Commission contains the type of information CNSI regards as protected and of the type not to be disclosed to unauthorized persons, including especially competitors, by present or former employees.

5. CNSI has obtained a competitive edge in the field of liquid radioactive waste solidification because of its extensive experience in the field and financial commitment to research, development and design concerning system components and improvements. CNSI mobile units, chemical process operating procedures, and process control procedures are presently superior to the equipment used by competitors for similar processes and this superiority is the basis on which system details are being withheld.

The information contained in the proprietary version of the Report is not available from public sources.

6. Public disclosure of the proprietary version of the Report would cause substantial harm to the competitive position of CNSI. The Company has invested in the neighborhood of \$1 million over the last two years in engineering salaries and capital equipment investment, and has committed to capital construction \$1.5 million so as to refine and improve CNSI's radioactive waste solidification system. Competitors of CNSI would have great difficulty in duplicating the system developed by CNSI, due not only to the financial investment of the company, but also to the unique skills, talents and expertise of CNSI employees who developed the system which is described in detail in the proprietary version of the Report.


7. The right of the public to disclosure of information held by the government is protected by the submission by CNSI of forty copies of the Report with confidential trade secret information omitted, and therefore, the CNSI competitive position clearly deserves protection, in regard to the twenty copies of the Report containing confidential information.


David G. Ebenhack, Director
Regulatory Affairs

STATE OF WASHINGTON)
)
COUNTY OF KING) ss:

On this 9th day of November, 1981, before me, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared David G. Ebenhack, to me known to be the Director of Regulatory Affairs for Chem-Nuclear Systems, Inc., and on oath stated that he was authorized to make this affidavit on behalf of the corporation.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal the day and year first above written.


NOTARY PUBLIC in and for the State
of Washington, residing in Kirkland