

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8303280278 DOC DATE: 83/03/23 NOTARIZED: YES DOCKET #: 05000335
 FACIL: 50-335 St. Lucie Plant, Unit 1, Floridal Power & Light Co.
 AUTH. NAME: AUTHOR: AFFILIATION: Floridal Power & Light Co.
 UHRIG, R. EL. RECIP. NAME: RECIP. AFFILIATION: Operating Reactors Branch 3
 CLARK, R. AL.

SUBJECT: Forwards proprietary, "Exxon Nuclear Analysis of Power Distribution Measurement Uncertainty for St. Lucie, Unit 1," Responses re overpressure mitigating sys & Cycle 6 reload, encl. Proprietary: rept withheld (ref. 10CFR2.790). *see rept*

DISTRIBUTION CODE: PA01S COPIES RECEIVED: LITR: 1 ENCL: 25 SIZE: 6.48
 TITLE: Proprietary Review Distribution Operating Reactor

NOTES:

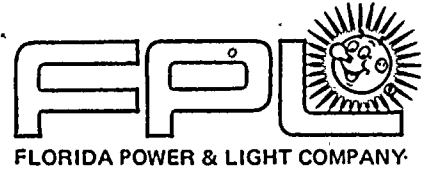
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INTERNAL:	ELD/HDS2: <i>#2 thru #8</i>	1 0	REGI FILE <i>#1</i>	1 1
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EXTERNAL:	ACRS <i>#10 thru #15</i>	6 6	LPDR:	1 0
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All Extras to NRR ORB #3 BC

001. Laboratory case withheld (ref 100F5, 190).
Remains of overgrown vegetation and a cycle of color
disturbance associated with the St. Lawrence I.
002: Formerly known as "Exxon Vector Analysis of Power

04704

[illegible]



March 23, 1983
L-83-170

WITHHOLD ATTACHMENTS FROM PUBLIC DISCLOSURE

Office of Nuclear Reactor Regulation
Attention: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Clark:

Re: St. Lucie Unit 1
Docket No. 50-335
Overpressure Mitigating System
and Cycle 6 Reload

We have reviewed your letter dated March 1, 1983 concerning the St. Lucie Unit 1 Overpressure Mitigating System (OMS) and the Cycle 6 Reload.

Our responses to the Reactor Systems Branch's questions concerning the OMS will be provided by the date requested in your letter.

Our responses to the Reactor Physics Section's questions concerning the Cycle 6 reload are attached. Included with this response is a copy of an affidavit for Exxon Nuclear Company which addresses the proprietary nature of the attached documents. The original copy of this affidavit was submitted previously in our letter (L-83-161) dated March 21, 1983.

Should you or your staff have further questions on this information, please contact us.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire
PNS-LI-83-205-1/7

8303280278 830323
PDR ADOCK 05000335
PDR

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is Vice President of Florida Power & Light Company, the Licensee herein;


That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

All of the enclosed material is proprietary, and therefore, exempt from public disclosure in accordance with Section 2.790 of the NRC "Rules of Practice", Title 10, Code of Federal Regulations.


Robert E. Uhrig

Subscribed and sworn to before me this

23rd day of March, 19 83.



NOTARY PUBLIC, in and for the County
of Palm Beach State of Florida.

My commission expires:

 Notary Public, State of Florida at Large
My Commission Expires April 20, 1986
~~Bonded thru Notary Bonding Agency~~



RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION ON CYCLE 6 RELOAD FROM
REACTOR PHYSICS SECTION/CORE PERFORMANCE BRANCH

Request 1: Provide the report "Exxon Nuclear Analysis of Power Distribution Measurement Uncertainty for St. Lucie Unit 1" (XN-NF-83-01).

Response: Forty copies of XN-NF-83-01(P), "Exxon Nuclear Analysis of Power Distribution Measurement Uncertainty for St. Lucie Unit 1," January 1983 are enclosed. Please note that the enclosed report contains material that is considered proprietary. Consequently, it is requested that it be held from public disclosure pursuant to 10 CFR 2.790.

Request 2: Provide a description of the INPAX-II incore monitoring code if it is to be used for Cycle 6.

Response: A brief description of the calculational methodology of the INPAX-II incore monitoring code to be used for Cycle 6 is given in Section 3.0 of the enclosed report.

A F F I D A V I T

STATE OF Washington)
COUNTY OF Benton) ss.

I, Richard B. Stout, being duly sworn, hereby say and depose:

1. I am Manager, Licensing & Safety Engineering, for Exxon Nuclear Company, Inc. ("ENC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with ENC's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the documents XN-NF-83-01(P), entitled "Exxon Nuclear Analysis of Power Distribution Measurement Uncertainty for St. Lucie Unit 1," and XN-NF-83-08(P), entitled "Justification for XNB Departure from Nucleate Boiling for St. Lucie Unit 1," referred to as "Documents". Information contained in these Documents has been classified by ENC as proprietary in accordance with the control system and policies established by ENC for the control and protection of information.

4. The Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by ENC 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 being proprietary and confidential.

5. The Documents have been made available to Florida Power and Light in confidence, with the request that the information contained in the Documents not be disclosed or divulged.

6. The Documents contain information which is vital to a competitive advantage of ENC and would be helpful to competitors of ENC when competing with ENC.

7. The information contained in the Document is considered to be proprietary by ENC because it reveals certain distinguishing aspects of nuclear design analysis methods which secure competitive economic advantage to ENC for fuel design optimization and improved marketability, and includes information utilized by ENC in its business which affords ENC an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Documents.

8. The disclosure of the proprietary information contained in the Documents to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it extremely valuable insights into nuclear design analysis methods, and would result in substantial harm to the competitive position of ENC.

9. The Documents contain proprietary information which is held in confidence by ENC and is not available in public sources.

10. In accordance with ENC's policies governing the protection and control of information, proprietary information contained in the Documents has been made available, on a limited basis, to others outside ENC only as required and under suitable agreement providing for non-disclosure and limited use of the information.

11. ENC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

12. These Documents provide information which reveals nuclear design analysis methods developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the analysis methods revealed in the Documents. Assuming a competitor had available the same background data and incentives as ENC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ENC.

13. Based on my experience in the industry, I do not believe that the background data and incentives of ENC's competitors are sufficiently similar to the corresponding background data and incentives of ENC to reasonably expect such competitors would be in a position to duplicate ENC's proprietary information contained in the Documents.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.

Richard D. Stout

SWORN TO AND SUBSCRIBED

before me this 14 day of

MAR, 1983.

William E. Backus
NOTARY PUBLIC

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