

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

TA C 60804
PDR

April 25, 1986
G02-86-370

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attn: Howard Richings
BWR Project Directorate No. 3
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555


Dear Mr. Richings:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NFP-21
REQUEST FOR AMENDMENT TO TECHNICAL
SPECIFICATIONS - RELOAD LICENSE
AMENDMENT (CYCLE 2)

References: Letter, G02-86-173, dated February 26,
1986, GC Sorensen to EG Adensam, Same
Subject.

Enclosed are two copies of the Exxon Nuclear Company (ENC) document XN-
NF-85-138(P) entitled LOCA Break Spectrum Analysis For A BWR 5. This
document, which is ENC proprietary, is reference 19 in Attachment II
(WPPSS-EANF-101) of the above reference.

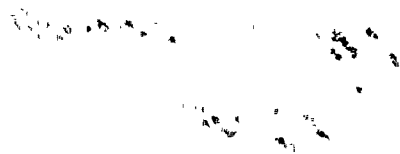
If additional copies are required, please contact Mr. P. L. Powell,
Manager, WNP-2 Licensing.


G. C. Sorensen (MD 280)
Manager, Regulatory Programs.

WCW:jmm
Attachments (as stated)

cc: EG Adensam - NRC
JO Bradfute - NRC
C Eschels - EFSEC
JB Martin - NRC RV
E Revell - BPA
NS Reynolds - BLCP&R
NRC Site Inspector

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STATE OF WASHINGTON)
)
County of Benton)

Amend. Request Reload License
(Cycle 2)
Subject: _____

I, G. C. Sorensen, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

The attached report XN-NF-85-138(P) "Loca Break Spectrum Analysis for a BWR-5" (December 1985) contains proprietary information prepared by Exxon Nuclear Co., Inc. and is to be withheld from public disclosure in accordance with 10CFR 2.790.

DATE 25 APRIL, 1986

G. C. Sorensen
G. C. Sorensen, Manager
Regulatory Programs

On this day personally appeared before me G. C. Sorensen to me known to be the individual who executed the foregoing instrument and acknowledge that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 25th day of April, 1986.

Lee M. Moore
Notary Public in and for the
State of Washington
Residing at Richland
Commission expires 7/4/88

A F F I D A V I T

STATE OF Washington)
COUNTY OF Benton) ss.

I, Gary N. Ward, being duly sworn, hereby say and depose:

1. I am Acting Manager, Licensing and 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 document XN-NF-85-138(P), entitled "LOCA Break Spectrum Analysis for a BWR/5 Plant," referred to as "Document." Information contained in this Document 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 Document contains 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 Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document not be disclosed or divulged.

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

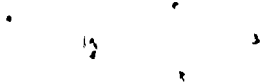
7. The information contained in the Document is considered to be proprietary by ENC because it reveals certain distinguishing aspects of BWR accident analysis methodology which secure competitive advantage to ENC for fuel design optimization and marketability, and includes information utilized by ENC 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 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 extremely valuable insights into BWR accident analysis methodology and would result in substantial harm to the competitive position of ENC.

9. The Document contains 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 Document 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.

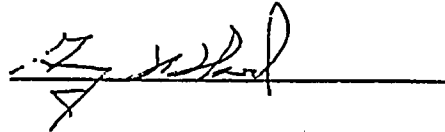


12. This Document provides information which reveals BWR accident analysis methodology developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the BWR accident analysis methodology revealed in the Document. Assuming a competitor had 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 Document.

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

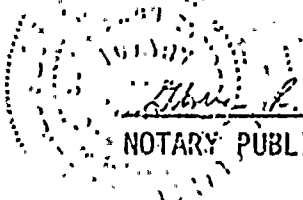
FURTHER AFFIANT SAYETH NOT.



SWORN TO AND SUBSCRIBED

before me this 25th day of

April, 19 86.



Thomas R. Fitzgerald
NOTARY PUBLIC

