

# EXXON NUCLEAR COMPANY, INC.

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October 15, 1985

RAC:069:85

Donald C. Cook Nuclear Plant Unit No. 2  
Docket No. 50-316  
License No. DPR-74  
TRANSMITTAL OF  
CYCLE 6 SAFTY ANALYSIS REPORT  
IN SUPPORT OF UNIT 2 OPERATION

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

- Refs: (1) XN-NF-85-28, "D.C. Cook Unit 2, Cycle 6 Safety Analysis Report,"  
Exxon Nuclear Company, July 1985
- (2) XN-NF-85-28(P), Supplement 1, "D.C. Cook Unit 2, Cycle 6 Safety  
Analysis Report: Disposition of the Standard Review Plan  
Chapter 15 Events," Exxon Nuclear Company, October 1985

Dear Mr. Denton:

Enclosed are five copies of each of the reference Exxon Nuclear Company technical reports which support operation of the D.C. Cook Unit 2 Nuclear Plant. At the request of American Electric Power Service Company (AEPSC), this report is being transmitted directly by Exxon Nuclear.

Exxon Nuclear Company considers information contained in the enclosed reference 2 report to be proprietary. In accordance with the Commission's Regulation 10 CFR 2.790(b), the enclosed Affidavit executed by Mr. H.E. Williamson of Exxon Nuclear provides the necessary information to support the withholding of the enclosed technical report from public disclosure.

If you have any questions regarding this transmittal, please contact Mr. James G. Feinstein of AEPSC at (614) 233-2040.

Sincerely,

*R. A. Copeland*

R. A. Copeland  
PWR Reload Licensing

TWO RIDS  
T007  
1/5 PMP

T008  
1/5 NON PMP

8510170289 851015  
PDR ADDCK 05000316  
P PDR

naa

cc: Mr. D.L. Wigginton (NRC) (w/att.)  
Mr. N. Lauben (NRC) (w/att.)  
Mr. M.P. Alexich (AEPSC)

A F F I D A V I T

STATE OF WASHINGTON    )  
                              ) . ss.  
COUNTY OF BENTON     )

I, H. E. Williamson being duly sworn, hereby say and depose:

1. I am 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 entitled 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 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 will 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 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 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 developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the 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.

H. E. Williamson

SWORN TO AND SUBSCRIBED

before me this 8<sup>th</sup> day of

October, 1985.



35

