

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

December 27, 1982

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

Dear Mr. Denton:

In the Matter of) Docket Nos. 50-327
Tennessee Valley Authority) 50-328

Enclosed for your information and review are drawings referenced in our Sequoyah Nuclear Plant operating license amendment request for a volume reduction system, submitted under separate letter. As indicated in the amendment package, in accordance with 10 CFR 2.790(b), these drawings have been determined by the suppliers, Aerojet Energy Conversion Company and Stock Equipment Company to contain proprietary material.

Also enclosed are copies of the affidavits regarding proprietary information required by 10 CFR 2.790(b).

If you have any questions regarding this submittal, please get in touch with Ken Parr at FTS 858-2685.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills

L. M. Mills, Manager
Nuclear Licensing

Sworn to and subscribed before me
this 27th day of Dec. 1982

Paulette H. White

Notary Public

My Commission Expires 9-5-84

PROPRIETARY
MATERIAL ATTACHED

Enclosures

cc: U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

8212300293 821227
PDR ADDCK 05000327
PDR

Drawings
To: BGC-2 sets
CF-1 set
PA01
5/3

STOCK

16493 Chillicothe Road
Chapin Falls, Ohio 44022
(216) 543-6000
Telex 98-0611

November 19, 1982
SST-107

NOV 22 1982

Mr. John A. Raulston
Chief Nuclear Engineer
Tennessee Valley Authority
WDC126; 400 Commerce Avenue
Knoxville, Tennessee 37902

Attn: Mr. T. G. Chapman

JAR: CBW	DRAFT	COM.	INFO	DUE
CC:	REPLY	COPY	COPY	DATE
EEB, W8C126C-K				
CEB W9C126C-K				
MEB W7C126C-K				
HNC 249A HBB-K				
RWW (DLW)			2	
TGC (DLM/MSD)	✓			11/10
LWL			1	
JCS				

Subject: STOCK Radwaste Solidification System
TVA Contract 81K68-827379-1
STOCK Ref: S.O. 5909 - Sequoyah
S.O. 5910 - Watts Bar
Proprietary Statement

Gentlemen:

On November 18, 1982 TVA advised STOCK that TVA was about to submit license amendment documents to the NRC for the Sequoyah and Watts Bar Nuclear Plants.

Pursuant to the requirements of 10CFR 2.790, "Availability of Official Records", STOCK has evaluated submittals made to TVA under contract 81K68-827379-1 and has determined that proprietary information is contained in specific STOCK Solidification System Piping and Information Drawings and Process Flow Diagrams and that they should not be reproduced or used in any way detrimental to the interest of Stock Equipment Company. These documents define in schematic form systems and/or equipment currently in research or development. These documents are currently being utilized to obtain patents, both U.S. and foreign.

- A. The following is a list of Piping and Instrumentation Drawings and Process Flow Diagrams submitted to TVA that are proprietary in nature and are currently being used to apply for patents. These documents are all applicable to the Polymer Solidification System.

NSHL

NOV 22 8 22 AM '82

NEB MASTER FILE

MEDS, W5B63 C-K

NAR

N2N-006A
N3N-004A

NEB 82 11 22 632

JAE
JFC
MST
MNU
DCS
NAI
RWM
NSA
SHR
GRJ

Mr. John A. Raulston
Proprietary Statement

November 19, 1982
Page 2

<u>Drawing No.</u>	<u>Title</u>
D17467-O Sheet 4	P&ID - Drumming Station - Dry Salt
D17467-A Sheet 4	" " " " " "
D18699-O Sheet 1	" " " " " "
D18699-O Sheet 2	" " " " " "
D17467-O Sheet 5	P&ID - Polymer Fill Station & Storage Tank
D17467-A Sheet 5	" " " " " " " "
D17467-B Sheet 5	" " " " " " " "
C12421-A Sheet 1	Process Flow Diagram - Identification & Symbology
C12421-A Sheet 7	Process Flow Diagram - Polymer Filling Station and Storage Tank
C12735-O Sheet 1	Process Flow Diagram - Dry Product Drumming Station & Transfer System
C12735-O Sheet 2	" " " Same as above
C12735-O Sheet 3	" " " " " "
C12735-O Sheet 4	" " " " " "
LD18183-O Sheet 1	P&ID - Drumming Station - Polymer (Dry) Transfer System Dry Product
LD18183-O Sheet 2	" Same as above
LD18183-O Sheet 3	" " " " "
LD18183-O Sheet 4	" " " " "

D. Contact Dose Rate Study

On November 4, 1981 STOCK submitted a Contact Dose Rate Study to TVA attached to letter SST-034. We have determined that since the data was developed by the STOCK Engineering Group, it should be considered as proprietary information and should not be disclosed to the general public. Proprietary information concerning shielding capabilities of STOCK manufactured components can be derived from this document.

C. The following is a list of Piping and Instrumentation Drawings and Process Flow Diagrams submitted to TVA for review or approval that are not of a proprietary nature and, therefore, contain information that can be made available to the general public:

<u>Drawing No.</u>	<u>Title</u>
D17467-O Sheet 1	P&ID - Symbology
D17467-A Sheet 1	" "
D17467-B Sheet 1	" "
D17467-C Sheet 1	" "
D17467-O Sheet 2	P&ID - 5000 Gallon Storage Station "A"
D17467-A Sheet 2	" " " " " "
D17467-B Sheet 2	" " " " " "
D17467-C Sheet 2	" " " " " "

Mr. John A. Raulston
Proprietary Statement

November 19, 1982
Page 3

<u>Drawing No.</u>	<u>Title</u>
D17467-O Sheet 3	P&ID - 5000 Gallon Storage, Station "B"
D17467-A Sheet 3	" " " " " "
D17467-B Sheet 3	" " " " " "
E812-O	P&ID - Drumming Station - Cement
E812-A	" " " " "
E812-B	" " " " "
E812-C	" " " " "
E813-O	P&ID - Decanting Station - 500 Gallon
E813-A	" " " " "
E813-B	" " " " "
E813-C	" " " " "
E1005-O Sheet 1	P&ID - Cement Storage Silo
E1005-A Sheet 1	" " " " "
E1005-O Sheet 2	P&ID - Cement Fill Station
E1005-A Sheet 2	" " " " "
C12421-O Sheet 2	Process Flow Diagram - Liquid & Slurry Process System
C12421-O Sheet 3	" " " " Same as above
C12421-O Sheet 4	" " " " " "
C12421-O Sheet 5	" " " " " "
C12421-O Sheet 6	" " " " " "

If you have any comments or questions concerning this issue, please advise.

Very truly yours,

STOCK EQUIPMENT COMPANY

Paul S. Hunt
Paul S. Hunt
Vice President, Engineering

PSH:JRL:ck

cc: David Marks

State of Ohio) ss
County of Geauga)

Before me personally came Paul S. Hunt, to me personally known, who swore that the above statements regarding proprietary information are true and correct to the best of his knowledge.

November 19, 1982

Carolyn H. Gannon
CAROLYN H. GANNON, Notary Public
Geauga County, State of Ohio
My Commission Expires August 24, 1986



Aerojet
Energy Conversion
Company

NOV 24 1982

P.O. Box 13222
Sacramento, California 95813
Telephone (916) 355-2000

JAR: CBW	DRAFT	COM.	INFO	DUE
CC:	REPLY	COPY	COPY	DATE
EEB, W5C126C-K				
CEB, W5C126C-K				
MES, W5C126C-K				
HNC 249A HBB-K				
DWW (DLW)			2	
TGC (DM/MST)	✓			11/10
LWL			1	
JCS				

Mr. J. A. Raulston
Chief Nuclear Engineer
TVA-W10C126
400 West Summit Hill Drive
Knoxville, TN 37902

Attention: Mr. T. G. Chapman

Subject: Volume Reduction System Contract 81K68-827379, Sequoyah
Nuclear Plant; Licensing Amendment for Volume Reduction
System

Gentlemen:

Confirming the telephone conversation this date between Mr. R. W. Marshall
and the undersigned, there is enclosed the affidavit required by 10 CFR
2.790(b).

The affidavit applies to our Piping and Instrumentation Diagrams (Drawing
1193002), and to the Material Balance Flow Diagram (Drawing 1193003).

If additional information is required, please contact the undersigned or
Mr. J. L. Dooling at 916-355-2047.

Very truly yours,

K. F. Royer
K. F. Royer
Program Manager
VR Systems

cc: D. H. Marks

NEB MASTER FILE

MEDS, W5B63 C-K

N2N-006

N3N-004

NAR

NOV 24 1982
JAF
11/29/82
X2134
MST/MST
VLT/VLT
NAR
RWM
NSA
SME
GRJ

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Aerojet Energy Conversion Company
State of California
County of Sacramento

I, Stanley P. Ferreira, am the Manager, Contracts and Business Administration, of Aerojet Energy Conversion Company, 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 for withholding this information.

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

Aerojet Energy Conversion Company Topical Report No. AECC 3-P,
entitled, "Radioactive Waste Volume Reduction System,"
December 15, 1981.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Aerojet Energy Conversion Company 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 is (1) Piping and Instrumentation Diagrams (Dwg 1193002), for the Aerojet Energy Conversion Company Radioactive Waste Volume Reduction System, and (2) Material Balance Flow Diagram (Dwg 1193003), for the Aerojet Energy Conversion Company Radioactive Waste Volume Reduction System, both of which are owned and have been held in confidence by the Aerojet Energy Conversion Company.
2. The Piping and Instrumentation Diagrams contain information relating to the type, placement, and number of process instruments required for control of the process. These diagrams also contain information on the various control loops and control logic and represent the control system design. The Material Balance Flow Diagram contains the pressures, temperatures, and flow rates existing throughout the system and represents the process design. Application of this information results in a substantial competitive advantage to Aerojet Energy Conversion Company.
3. The information is of a type customarily held in confidence by Aerojet Energy Conversion Company and not customarily disclosed to the public. Aerojet Energy Conversion Company 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. This system was applied in determining that the subject document herein is proprietary.
4. The information is being transmitted to the Tennessee Valley Administration and 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 TVA and 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 Aerojet Energy Conversion Company because:

a. A similar product is manufactured and sold by a major competitor of AECC.


b. Development of this information by AECC required thousands of man-hours 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 development of experimental and demonstration test facilities.

d. The information represents the control system design and the process design, 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 AECC, take marketing or other actions to improve their product's position or impair the position of AECC's product, and avoid developing similar information in support of their processes, methods, or apparatus.

e. In pricing AECC's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance, and other costs and expenses must be included. The ability of AECC's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

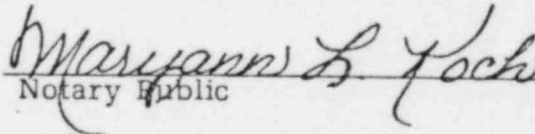
f. Use of the information by competitors in the international marketplace would increase their ability to market radioactive waste volume reduction systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on AECC's potential for obtaining or maintaining foreign licenses.


S. P. Ferreira, Manager
Contracts & Business Administration

STATE OF CALIFORNIA)
 : ss.
County of Sacramento)

On this 19th day of November, 1982 before me, the undersigned, a Notary Public in and for said State, personally appeared STANLEY P. FERREIRA, personally known to me or proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the foregoing Affidavit and acknowledged that he executed the same.

WITNESS my hand and official seal.


Notary Public

