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April 7, 1983

Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Limerick Generating Station Units 1 & 2  
Docket Nos. 50-352 & 50-353

Dear Mr. Schwencer:

In response to a request from Mr. Robert Martin of the NRC Staff, there is transmitted herewith a copy of the document entitled ANALYSIS OF DETONATION DESIGN PRESSURE FOR HYDROGEN LIMERICK CHARCOAL OFFGAS TREATMENT SYSTEMS which is Reference 11.3-5 of the Limerick Final Safety Analysis Report.

We have been advised by Koch Process Systems, Inc. that the enclosed Analysis contains information which Koch Process Systems, Inc. considers to be confidential and proprietary information containing trade secrets. Accordingly, it is hereby requested pursuant to Section 2.790 of the Commission's

ENCLOSURE CONTAINS §2.790 CONFIDENTIAL INFORMATION

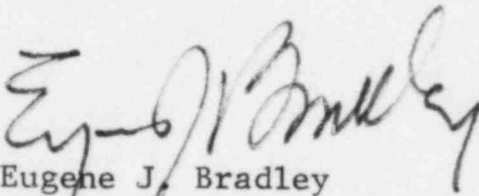
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Mr. A. Schwencer  
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Regulations that the enclosed Analysis be withheld from public disclosure. An affidavit of W. K. Higgins, Vice President Waste Management Systems Division, Koch Process Systems, Inc., setting forth the grounds in support of this request is attached hereto.

Very truly yours,



Eugene J. Bradley

EJB/pkc  
encs.  
cc: See attached Service List

cc: Judge Lawrence Brenner (wo/enclosures)  
Judge Richard F. Cole (wo/enclosures)  
Judge Peter A. Morris (wo/enclosures)  
Troy B. Conner, Jr., Esq. (wo/enclosures)  
Ann P. Hodgdon (wo/enclosures)  
Mr. Frank R. Romano (wo/enclosures)  
Mr. Robert L. Anthony (wo/enclosures)  
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Judith A. Dorsey, Esq. (wo/enclosures)  
Charles W. Elliott, Esq. (wo/enclosures)  
Mr. Alan J. Noguee (wo/enclosures)  
Robert W. Adler, Esq. (wo/enclosures)  
Mr. Thomas Gerusky (wo/enclosures)  
Director, Pennsylvania Emergency (wo/enclosures)  
Management Agency  
Steven P. Hershey (wo/enclosures)  
James F. Neill, Esq. (wo/enclosures)  
Donald S. Bronstein, Esq. (wo/enclosures)  
Mr. Joseph H. White, III (wo/enclosures)  
Walter W. Cohen, Esq. (wo/enclosures)  
Robert J. Sugarman, Esq. (wo/enclosures)  
Rodney D. Johnson (wo/enclosures)  
Atomic Safety and Licensing Appeal Board (wo/enclosures)  
Atomic Safety and Licensing Board Panel (wo/enclosures)  
Docket and Service Section (wo/enclosures)

AFFIDAVIT

COMMONWEALTH OF MASSACHUSETTS)

: SS

COUNTY OF WORCESTER)

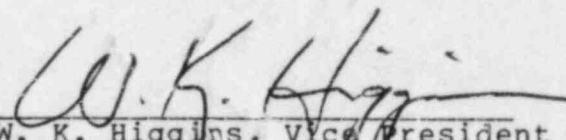
I, W. K. Higgins, being duly sworn according to law depose and say that I am Vice President, Waste Management Systems Division, of Koch Process Systems, Inc. ("KPS"), I am authorized to execute this affidavit on behalf of KPS, and that:

1. For the reasons listed below, the report entitled "Analysis of Detonation Design Pressure for Hydrogen Limerick Charcoal Offgas Treatment Systems Units 1 and 2" together with Appendix A thereto ("The Analysis") which is being filed with the United States Nuclear Regulatory Commission by Philadelphia Electric Company in connection with its License Application at Docket Nos. 50-352 and 50-353 contains information considered by KPS to be confidential, proprietary information containing trade secrets and should be withheld from public disclosure.

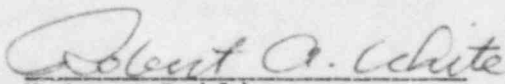
2. In support of its averment that the above mentioned Analysis is confidential, KPS provides the following reasons:

- a. KPS is the successor to Helix Process Systems who was the successor of the Nuclear Systems Group of CTi-Nuclear, which predecessor company developed the methods and information contained in the Analysis and KPS has acquired the right, title and interest of the predecessor company in the Analysis.
- b. The Analysis contains information and analytical methods developed by KPS and its predecessor company as a result of substantial expense and effort. KPS estimates that approximately \$100,000.00 have been expended in developing the methods and information contained in the Analysis.
- c. The information contained in the Analysis has been and will continue to be held in strict confidence by KPS. External distribution of this information is restricted. The information is provided to clients of KPS with limitations on its duplication, use and disclosure.

- d. The information contained in the Analysis is not available from public sources.
- e. Because of the expense it has incurred in the development of the information contained in the Analysis, the marketability thereof, the economic harm that KPS would suffer from its inability to market the information and the adverse competitive impact on KPS of making the information available to the public, including competitors of KPS, without charge, the need for protecting KPS interests outweighs the interest involved in public disclosure of the information.

  
W. K. Higgins, Vice President  
Waste Management Systems  
Division  
KCCH PROCESS SYSTEMS, INC.

Subscribed and sworn to  
before me this 4<sup>th</sup>  
day of April, 1983.

  
Notary Public  
Robert A. White  
My commission expires 3/18/88