



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

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October 14, 1983

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

Subject: LaSalle County Station Unit 1
In-Plant SRV Test - Final Evaluation Report
NRC Docket No. 50-373

Reference: (a): NUREG 0519, Safety Evaluation Report
Related to the Operation of LaSalle

(b): C. W. Schroeder Letter to Director of Nuclear
Reactor Regulation dated March 4, 1983.

Dear Mr. Denton:

Reference (a) states, in part: "The applicant has committed to perform a comprehensive safety relief valve in-plant test which is to be completed prior to commercial operation of the facility. These tests will include single and multiple valve tests. The applicant has committed to confirm the adequacy of the piping system design based on the results of these in-plant tests."

Reference (b) transmitted an initial evaluation report which provided a preliminary confirmation as to the conservatism of the design criteria for SRV air bubble loads.

This letter transmits the Commonwealth Edison proprietary "LaSalle County Station Unit 1 in-plant SRV Test Final Evaluation Report". This report concludes that (1) the containment, structures, piping and supports are conservatively designed for the SRV discharge loads, (2) the methods used for predicting the loads imposed by the SRV discharges are conservative, (3) the procedures used to predict the structural responses to the SRV discharges are adequate, and (4) the analytical techniques used to qualify safety-related equipment are conservative. Also enclosed please find the affidavit of Mr. Brent R. Shelton attesting to the proprietary nature of this material.

It is, therefore, respectfully requested that the enclosed Final Evaluation Report be withheld from public disclosure in accordance with the provisions of 10CFR2.790.

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Enclosed please find one signed original and ten (10) copies of this letter and affidavit, and ten copies of the report.

If there are any questions in this matter, please contact this office.

Very truly yours,

CW Schroeder 10/14/83

C. W. Schroeder
Nuclear Licensing Administrator

cc: NRC Resident Inspector LSCS 1/0

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AFFIDAVIT

I, BRENT R. SHELTON, being duly sworn, depose and state the following:

1. I am the Projects Engineering Manager for Commonwealth Edison Company and have been delegated the function of reviewing the information described in paragraph 2 which is sought to be withheld from public disclosure and have been authorized to apply for its withholding.
2. The information sought to be withheld is the document entitled, "LaSalle County Unit 1 In-Plant SRV Test Final Evaluation Report" dated September 1983.
3. In designating material as proprietary, Commonwealth Edison Company utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information Some factors to be considered in determining whether given information is one's trade secret are: (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and to his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. The designated document constitutes information and data which demonstrate the adequacy of existing design basis hydrodynamic loads resulting from safety/relief valve actuation. This data was acquired during testing at LaSalle County Station. Test results apply to any other user of the load mitigating T-quencher device located on the end of the S/RV discharge line. Since all users of this device must submit design basis data to the Nuclear Regulatory Commission, the test report is extremely valuable to other users. In addition, because the development of the information entailed significant effort and expenditure, public disclosure of the information would deny Commonwealth Edison Company its proprietary interest.

Both the test and the Final Evaluation Report were funded solely by Commonwealth Edison Company. Commonwealth Edison Company is therefore the owner of the proprietary information. The test data has been held in confidence by Commonwealth Edison Company and is not otherwise available, or known to others.

The report also contains generic load definition information which is held proprietary by Pennsylvania Power and Light and Kraftwerk Union.

5. Initial approval of proprietary treatment of a document is made by the Project Engineering personnel most acquainted with the value and sensitivity of the information in relation to industry knowledge.
6. The document mentioned in paragraph 2 above has been evaluated in accordance with the above criteria and practices and has been found to contain information which is proprietary and which is customarily held in confidence by Commonwealth Edison Company.

BRENT R. SHELTON, being duly sworn, deposes and states that he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information and belief.

Executed at Chicago, Illinois, this 13TH day of October 1983.

Brent R. Shelton 10/13

BRENT R. SHELTON
Commonwealth Edison Company

Then personally appeared before me Brent R. Shelton who being duly sworn, did state the foregoing information is true and correct to the best of his knowledge and belief.

Al. L...

Notary Public