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December 28, 1994
C321-94-2355

U. S. Nuclear Regulatory Commission
Att: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219
Facility Operating License No. DPR-16
Core Shroud - 15R Outage Enhancement,
Confirmatory Non-Linear Dynamic Seismic Analysis

References: (1) NRC Letter dated November 25, 1994, "Safety Evaluation
Regarding the Oyster Creek Core Shroud Repair
(TAC No. M90104)."

(2) GPU Nuclear Letter C321-94-2287, "Core Shroud - 15R
Outage Enhancement," dated November 1, 1994.

In response to the NRC Staff's request (Reference 1, Page 6), enclosed is GPU Nuclear's confirmatory non-linear dynamic seismic analysis for Oyster Creek's Core Shroud Enhancement. This analysis was made to confirm that the Reference 2 seismic evaluation, performed in accordance with Oyster Creek's licensed seismic design basis, conservatively envelopes any non-linear dynamic seismic effects for the Core Shroud Enhancement. This additional, beyond design basis, evaluation demonstrates the conservatism present in Oyster Creek's current licensed seismic design and the Reference 2 analysis for the Core Shroud.

The enclosed report entitled "Confirmatory Dynamic Analysis of Oyster Creek Reactor Internals for Core Shroud Repair Evaluation", MPR-1579, Rev. 0, dated December, 1994, contains information determined to be proprietary, and an affidavit as required by 10 CFR 2.790(b)(1) is attached.

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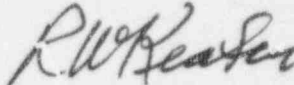
GPU Nuclear Corporation is a subsidiary of General Public Utilities Corporation

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If you have any questions or comments on this submittal, please contact
Mr. Michael Laggart, Manager, Corporate Nuclear Licensing at (201) 316-7968.

Very truly yours,



R. H. Keaten
Vice President and Director
Technical Functions

Attachment
RTZ/plp

**ALL PROPRIETARY INFORMATION HAS BEEN
REMOVED FROM THIS COPY**

c: Administrator, Region 1, w/o Proprietary Report
Senior Resident Inspector, w/o Proprietary Report
Oyster Creek NRC Project Manager, w/Proprietary Report

ATTACHMENT

"Confirmatory Dynamic Analysis of Oyster Creek Reactor Internals for Core Shroud Repair Evaluation", MPR-1579, Rev. 0, dated December, 1994.

This attachment contains Proprietary Information as defined in 10CFR2.790(a)(4).
An affidavit as required by 10CFR2.790(b)(1) to support this determination follows.

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December 22, 1994

**AFFIDAVIT PURSUANT TO 10 CFR 2.790
RELATIVE TO CORE SHROUD REPAIR
FOR OYSTER CREEK**

MPR Associates, Inc.
State of Virginia
City of Alexandria

I, Noman M. Cole, depose and say that I am a Principal of MPR Associates, Inc. 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 in conjunction with General Public Utilities Nuclear Corporation (GPUN).

The information for which proprietary treatment is sought is contained in the attached MPR report titled, "Confirmatory Dynamic Analysis of Oyster Creek Reactor Internals for Core Shroud Repair Evaluation," Revision 0, dated December 1994. This report contains detailed design information and data on the design of the shroud repair system for the Oyster Creek Nuclear Generating Station.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by MPR Associates in designating information as a trade secret, privileged or as confidential commercial or financial information.

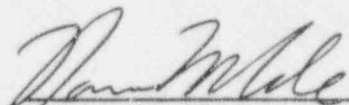
Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure, which is owned and has been held in confidence by MPR Associates, is the design of the shroud repair system for the Oyster Creek Nuclear Generating Station.
2. The information consists of design information or other similar data concerning a repair system, method or component, the application of which results in substantial competitive advantage to MPR Associates. MPR has a patent application pending for this shroud repair system.

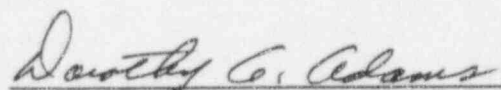
3. The information is of a type customarily held in confidence by MPR Associates and not customarily disclosed to the public. MPR Associates has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when 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 Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by 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 MPR Associates because:
 - a. Other repairs for similar purposes are performed and sold by major light water reactor competitors of MPR Associates.
 - b. Development of these repair designs by MPR Associates required thousands of manhours 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 to develop these repair designs.
 - d. The information consists of information related to repair of cracked shrouds in the Oyster Creek Nuclear Generating Station and other BWRs as well. The application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their designs to better compete with MPR Associates, take marketing or other actions to improve their position or impair the position of MPR Associates' design, and avoid developing similar data and analyses in support of their design methods or shroud repair system.
 - e. In pricing MPR Associates products and services, significant research, development, engineering, analytical, manufacturing, quality assurance and other costs and expenses must be included. The ability of MPR Associates' 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 such repair designs by reducing the costs

associated with their technology development. In addition, disclosure would have an adverse economic impact on MPR Associates' potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.


Norman M. Cole
Principal

Sworn to before me
this 22nd day of December, 1994


Notary Public

My commission expires: March 31, 1996