



PSEG

Public Service
Electric and Gas
Company

80 Park Plaza, Newark, NJ 07101 / 201 430-8217 MAILING ADDRESS / P.O. Box 570, Newark, NJ 07101

Robert L. Mittl General Manager
Nuclear Assurance and Regulation

April 4, 1985

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20814

Attention: Mr. Albert Schwencer, Chief
Licensing Branch 2
Division of Licensing

Gentlemen:

SAFETY EVALUATION REPORT OPEN ITEM 7 AND CONFIRMATORY
ITEM 29
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

Attached, for NRC staff review, is one (1) copy of Wyle Test Report 17730-01 "Cable and Raceway Physical Separation Verification Testing" dated March 1985. This test report along with revised FSAR Sections 1.8.1.75 and 8.1.4.14.3 (attached) provide the response to Safety Evaluation Report Open Item 7 and Confirmatory Item 29. These revised FSAR sections will be incorporated into Amendment 10 of the HCGS FSAR.

PSEG requests the enclosed proprietary Wyle Test Report 17730-01 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 for the reasons set forth in the attached affidavit.

Should you have any questions in this regard, please contact us.

Very truly yours,

8504110482 850404
PDR ADOCK 05000354
E PDR

JES:mr

The Enclosure

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JES:mr
The Energy People

AFFIDAVIT

I, Thomas J. Martin, being duly sworn, depose and state as follows:

- (1) I am Vice President - Engineering and Construction of Public Service Electric and Gas Company. I have been delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing.
- (2) I am making this Affidavit in conformance with the revisions of 10CFR Section 2.790 of the Commission's regulations and in conjunction with the Public Service Electric and Gas application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Public Service Electric and Gas Company in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) 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 should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Public Service Electric and Gas.
 - (ii) The information is of a type held in confidence by Public Service Electric and Gas and not disclosed to the public. Public Service Electric and Gas has a rational basis for determining the types of information 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. The application of that system and the substance of that system constitutes Public Service Electric and Gas policy and provides the rational basis required.
- (5) Under this system, some examples of categories of information which fit into the definition of proprietary information are:

- a. Information consisting of supporting data and analyses, including test data, relative to a process, method or apparatus, the application of which provide a competitive economic advantage, e.g., by optimization or improved marketability;
 - b. Information which if used by a competitor, would reduce his expenditure of resources in the licensing of a similar product;
 - c. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of Public Service Electric and Gas Company.
 - d. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
 - e. Information which Public Service Electric and Gas must treat as proprietary according to agreements with other parties.
- (6) The document mentioned in paragraph 9 below has been evaluated in accordance with the above system and has been found to contain information which is proprietary and which is customarily held in confidence by Public Service Electric and Gas.
- (7) The information is being transmitted to the Commission in confidence and, under the provisions of 10CFR Section 2.790, it is to be received in confidence by the Commission.
- (8) The information sought to be protected is not available in public sources to the best of our knowledge and belief.
- (9) The proprietary information sought to be withheld in this submittal is "Test Report on Cable and Raceway Physical Separation Verification Testing for use in Public Service Electric and Gas Company's Hope Creek Generating Station," dated March 1985, prepared by Wyle laboratories.


The subject information could only be duplicated by competitors if they were to invest time and effort equivalent to that invested by Public Service Electric and Gas.

- (10) Public disclosure of the information sought to be withheld is likely to cause substantial harm to the competitive position of Public Service Electric and Gas Company and deprive or reduce the availability of profit making opportunities.

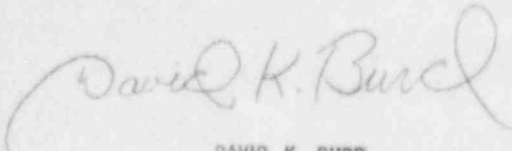
The matters set forth in this affidavit are true to the best of my knowledge, information, and belief.

Respectfully submitted,

Public Service Electric
and Gas Company

By: 
Thomas J. Martin
Vice President -
Engineering and Construction

Sworn to and subscribed
before me, a Notary Public
of New Jersey, this 4th day
of April 1985.



DAVID K. BURD
NOTARY PUBLIC OF NEW JERSEY
Expires 10-23-85

Mr. Albert Schwencer

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4/4/85

C D. H. Wagner
USNRC Licensing Project Manager (w/attach.)

A. R. Blough
USNRC Senior Resident Inspector (w/o attach.)

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