

Bechtel Power Corporation

Engineers — Constructors

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March 6, 1985

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

Subject: Georgia Power Company
Plant Vogtle - Units 1 and 2
Bechtel Job 9510
Application for Withholding
Proprietary Information from
Public Disclosure
File: X7BC35
Log: B0-138

Dear Mr. Denton:

Georgia Power Company has been requested by the NRC to provide certain information concerning piping system design calculations. Those calculations are proprietary information of Bechtel Power Corporation. They contain trade secrets which, if publicly available, would substantially impair the competitive position of Bechtel Power Corporation in the industry.

Accordingly, this letter will serve as the application of Bechtel Power Corporation, as owner of the information, for an exemption from the public disclosure rules. This exemption is sought pursuant to 10 CFR 2.790 and is supported by the attached affidavit of Charles W. Lacey.

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Bechtel Power Corporation

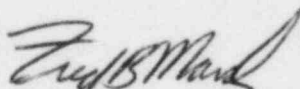
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Page 2

Please address inquiries or correspondence concerning this application to:

Mr. F. B. Marsh
Project Engineering Manager
Bechtel Power Corporation
Terminal Annex
P. O. Box 60860
Los Angeles, California 90060

Very truly yours,

BECHTEL POWER CORPORATION



F. B. Marsh
Project Engineering Manager
Western Power Division

JP/SJC/mw

Attachment: Affidavit of Charles W. Lacey

xc: O. Batum w/o att.
J. A. Bailey (SCS) w/att.
E. C. Rodabaugh (E. C. Rodabaugh Associates, Inc.) w/att.
S. Moore (Oak Ridge National Laboratory) w/att.
V-RMS w/att.

State of California)
) ss
County of Los Angeles)

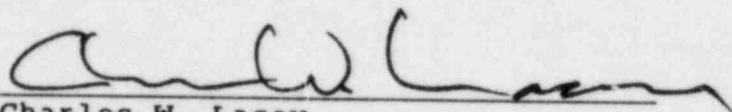
AFFIDAVIT OF CHARLES W. LACEY

Charles W. Lacey, being first duly sworn, deposes and says:

1. That I am a Vice President of Bechtel Power Corporation ("Bechtel"), and Deputy General Manager for Western Power Division, Architect and Engineer for the Vogtle Electric Generating Plant.
2. That, except for the matters expressly stated to be on information and belief, I have personal knowledge of the facts set forth herein, and could competently testify thereto.
3. That I have been specifically delegated, by Bechtel, the function of reviewing the documents discussed herein and am authorized to apply for their withholding on behalf of Bechtel which is the owner of this information.
4. That, based on my information and belief, the Nuclear Regulatory Commission ("NRC") has requested production of certain documents by Bechtel to be used by NRC consultants.
5. That, based on my information and belief, the following documents are among the documents sought:
 - a. Calculation No. X4CP-7075A, Rev. 2 Isometric No. 1K3-1301-010-02 Main Steam Stress Calculation
 - b. Calculation No. X4CP-7075, Rev. 1 Isometric No. 1K5-1301-012-02 Main Steam Stress Calculation
 - c. Calculation No. X4CP-S-7075 Isometric No. 1K5-1301-010-02 Tag No. V1-1301-010-H043 Miscellaneous Steel Calculation
6. That the documents identified in Paragraph 5 are Bechtel documents.
7. That the documents identified in Paragraph 5 should not be disclosed to the public because they are Bechtel's procedure describing Bechtel's means and methods for performing a portion of the design and construction. As such:

- a. The documents contain trade secrets of Bechtel.
 - b. The documents contain proprietary and confidential commercial information and data of Bechtel.
 - c. The documents contain proprietary and confidential discoveries and records of Bechtel.
8. That the following considerations are applicable to the reasons set forth in Paragraph 7:
- a. The information is held in confidence by Bechtel.
 - b. The information is of a type customarily held in confidence by Bechtel and there is rational basis for holding the information in confidence as set forth in Paragraph 7 above and in this paragraph.
 - c. The information is being transmitted to the NRC in confidence.
 - d. The information is not available in public sources.
 - e. Public disclosure of the information is likely to cause substantial harm to the competitive position of Bechtel for the following reasons:
 - 1) The information is valuable to Bechtel because it represents unique approaches and capabilities for resolving complex safety, technical, commercial and industry factors to comply with applicable laws, statutes and regulations.
 - 2) Substantial and significant effort and money have been and are being expended by Bechtel to develop, acquire and maintain the necessary expertise and capability in these highly specialized areas.
 - 3) Others would have difficulty in properly acquiring or duplicating this information which includes special applications of theoretical principles, complex analytical procedures and sophisticated design techniques.

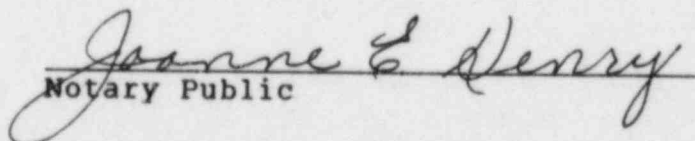
9. For the reasons set forth in this affidavit, Bechtel requests that the documents listed in paragraph 5 be designated as exempt from disclosure pursuant to 10 CFR 2.790.



Charles W. Lacey
Vice President and Deputy General
Manager, Western Power Division
Bechtel Power Corporation

STATE OF CALIFORNIA)
) ss
County of Los Angeles)

Subscribed and sworn to before me this 21st day of
February, 1985.



Notary Public

