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Detroit
Edison

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6400 North Dixie Highway
Newport, Michigan 48166
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February 27, 1985

NE-85-0338

*2nd - 4/18/85
Request*

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Youngblood:

Reference: Fermi 2
NRC Docket No. 50-341

Subject: Portable Liquid Radwaste System Description

Based on a conference call between Detroit Edison, NUS Process Services Corporation and members of the Effluent Treatment System Branch of the NRC, on February 21, 1985 the requested information concerning the portable liquid radwaste system supplied by NUS is provided.

Attachment 1 contains a description of the "TRANSFIX" portable radioactive liquid waste processing system. Attachment 2 depicts the location of the TRANSFIX system in the On Site Storage Facility. Both areas shown contain floor drains which are routed to a collection tank which can feed either the permanent or portable liquid radwaste system. If spillage in excess of the capacity of the local drains were to occur, the excess water would flow into the truck loading area and into the associated drain trench where it would be returned to the collection tank described above.

Attachments 3, 4, and 5 show the piping diagram for the Floor Drain Collector System, Waste Collector System and the Floor Drain and Waste Demineralizer System of the permanently installed liquid radwaste system. The typical flow paths to and from the interface points with the vendor supplied portable liquid radwaste system are indicated on these drawings. Motive force for the liquid is supplied primarily by one of the evaporator feed pumps. However, as described in Attachment 1, the vendor supplied system contains a pump which can also be used to increase flow rates if necessary. Pumping capacity for the evaporator feed pumps is described in Table 11.2-8 of the Fermi 2 Final Safety Analysis Report section (FSAR).

*Accg. 1/31 NP
5 Prop*

*Change: LPOR } Non
NRC FOR } Prop
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*Prop Encls
To: Reg File - 1
LB# 1 BC-4*

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Mr. B. J. Youngblood

February 27, 1985

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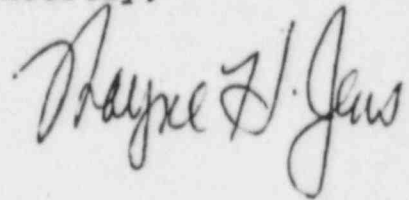
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Compliance with Appendix I of 10CFR50 is accomplished by the use of the Offsite Dose Calculation Manual (ODCM) to calculate liquid release parameters. The radionuclide concentrations in the effluent from the vendor supplied portable liquid radwaste system will be similar to that obtained by the permanently installed system. Since the liquid waste treated by the NUS TRANSFIX system is returned to the permanently installed liquid radwaste system, the methodology is the same as that used during the operation of the permanently installed system. The ODCM was submitted to the NRC via Detroit Edison letter, EF2-71988, dated October 11, 1984 and subsequently approved.

Attachment 6 contains an evaluation of the vendor supplied portable liquid radwaste system against Regulatory Guide 1.143.

Enclosures 2 through 5 of Attachment 1 are proprietary to NUS Corporation and should be withheld from public disclosure as permitted by 10CFR2.790. An affidavit to this effect is attached.

Sincerely,



Attachments

cc: Mr. P. M. Byron*
Mr. M. D. Lynch*
Mr. C. R. Nichols*
USNRC Document Control Desk
Washington, D.C. 20555
*(With Attachments 1 and 6)

**Affidavit to the Nuclear
Regulatory Commission Concerning Confidential
Information and Trade Secrets Contained in
NUS Process Services Corporation Drawings**

State of South Carolina
County of Richland

Steven B. McCoy states as follows on behalf of NUS Process Services Corporation.

1. I am the Director of Filtration/Ion Exchange Services for NUS Process Services Corporation.
2. I am familiar with the following drawings, hereinafter referred to as "the drawings", prepared by NUS Process Services Corporation:
 - o Dwg. No. 8900-M-2006, Rev. 5, "TRANSFIX System Vessel T-4"
 - o Dwg. No. 8911-M-2000, Rev. 3, "TRANSFIX System Piping & Instrumentation Diagram"
 - o Dwg. No. 8911-M-2001, Rev. 2, TRANSFIX System - Dewatering Piping & Instrumentation Diagram"
 - o Dwg. No. 9402-M-2100, Rev. 2, "TRANSFIX System Disposable Demineralizer Vessel"

The Detroit Edison Company has submitted copies of the drawings to the Nuclear Regulatory Commission. The drawings contain proprietary information which should be withheld from public disclosure.

3. NUSPSC's TRANSFIX Filtration/Ion Exchange System is one part of its waste processing business. This system for processing radioactive liquid wastes is unique to NUSPSC. Design and fabrication details for this system are held in strictest confidence by all employees.

All employees of NUSPSC complete an agreement with NUSPSC regarding protection and non-disclosure of trade secret information at the commencement of their employment. The information included in the drawings contains the type of information covered under the non-disclosure agreement. NUSPSC routinely stresses that such information is not to be discussed outside the company either during or after employment.

The TRANSFIX System represents a substantial commitment of personnel and financial resources for research, development, design and procedural controls. This commitment has resulted in a system currently superior to that provided by competitors and this superiority is the basis on which system details are withheld from public disclosure.

The information included in the drawings is not available through public sources.

Release through public channels of the drawings will substantially harm the competitive position of NUSPSC. NUSPSC has expended over \$500,000 in salaries and capital equipment during the last year to make these systems available. Duplication of this effort by competitors would require similar capital expenditures and the assembly of a team of experts similar to the design team employed by NUSPSC.

The right of the public to disclosure of information submitted to the Commission is protected by the non-proprietary, detailed system description submitted to the Commission by Detroit Edison Company. Therefore, NUSPSC's competitive position, as represented by the drawings which contain trade secret information, clearly deserves protection.

Steven B. McCoy

Steven B. McCoy

Director

Filtration/Ion Exchange Services

Sworn and subscribed before me this 26th day of February
1985.

Patricia L. Jewell
Notary Public

My Commission expires: November 17, 1993

ATTACHMENT 1