

# EXXON NUCLEAR COMPANY, INC.

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May 31 1985  
JCC:110:85

Dr. Cecil O. Thomas, Chief  
Standardization & Special Projects Branch  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: XN-NF-84-105(P), Volume 1, "XCOBRA-T: A Computer Code for BWR  
Transient Thermal-Hydraulic Core Analysis;" Submission for Review  
and Approval

Dear Dr. Thomas:

Enclosed for your information and review are twenty-three copies of the subject Exxon Nuclear licensing topical report. This technical report describes the thermal hydraulic core model used by Exxon Nuclear in the determination of thermal margin requirements for BWR plants. This transmittal comprises Volume 1 of XN-NF-84-105(P); Volume 2 contains user-oriented information not usually considered important to Staff review, and we do not intend to submit it for review.

Exxon Nuclear Company considers information contained in the subject topical report to be proprietary. In accordance with the Commission's Regulation 10 CFR 2.790(b), the enclosed Affidavit executed by our Dr. Richard B. Stout provides the necessary information to support the withholding of the subject topical report from public disclosure.

In compliance with the Commission's Regulation 10 CFR 170.12(f), Exxon Nuclear's check in the amount of \$150.00 has been enclosed with Mr. William O. Miller's copy of this letter as the Special Project application fee for the subject topical report.

If you have any questions regarding this submission, please feel free to contact me, telephone (509) 375-8639.

Sincerely,

*J.C. Chandler*

J.C. Chandler  
Reload Licensing

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PDR TOPRP EMVEXXN  
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Attachment

cc: Mr. David Moran (NRC)  
Mr. William O. Miller (NRC)  
Mr. Richard Lobel (NRC)

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A F F I D A V I T

STATE OF WASHINGTON    )  
                              ) ss.  
COUNTY OF BENTON        )

I, Richard B. Stout, being duly sworn, hereby say and depose:

1. I am Manager, Licensing and Safety Engineering, for Exxon Nuclear Company, Inc. ("ENC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with ENC's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the document XN-NF-84-105(P), entitled "XCOBRA-T: A Computer Code for BWR Transient Thermal-Hydraulic Core Analysis," referred to as "Document." Information contained in this Document has been classified by ENC as proprietary in accordance with the control system and policies established by ENC for the control and protection of information.

4. The document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by ENC and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as proprietary and confidential.

5. The Document has been made available to the U.S. Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document will not be disclosed or divulged.

6. The Document contains information which is vital to a competitive advantage of ENC and would be helpful to competitors of ENC when competing with ENC.

7. The information contained in the Document is considered to be proprietary by ENC because it reveals certain distinguishing aspects of BWR thermal-hydraulic analysis methods which secure competitive advantage to ENC for fuel design optimization and marketability, and includes information utilized by ENC in its business which affords ENC an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

8. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it extremely valuable insights into BWR thermal-hydraulic analysis methods and would result in substantial harm to the competitive position of ENC.

9. The Document contains proprietary information which is held in confidence by ENC and is not available in public sources.

10. In accordance with ENC's policies governing the protection and control of information, proprietary information contained in the Document has been made available, on a limited basis, to others outside ENC only as required and under suitable agreement providing for non-disclosure and limited use of the information.

11. ENC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

12. This Document provides information which reveals BWR thermal-hydraulic analysis methods developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the BWR thermal-hydraulic analysis methods revealed in the Document. Assuming a competitor had available the same background data and incentives as ENC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ENC.

13. Based on my experience in the industry, I do not believe that the background data and incentives of ENC's competitors are sufficiently similar to the corresponding background data and incentives of ENC to reasonably expect such competitors would be in a position to duplicate ENC's proprietary information contained in the Document.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.

Richard J. Belmont

SWORN TO AND SUBSCRIBED

before me this 31<sup>st</sup> day of

May, 1985.

Maria R. Fitzgerald

NOTARY PUBLIC