

Docket File / PDR

BWR OWNERS' GROUP

Cynthia L. Tully, Chairperson
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c/o Southern Nuclear Operating Company • P.O. Box 1295, Bin 8052 • Birmingham, AL 35201

BWROG-93020

February 9, 1993

U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: A. C. Thadani, Director
Division of Systems Safety & Analysis

Subject: PROPRIETARY INFORMATION TO BE COVERED IN BWR OWNERS' GROUP MEETING WITH NRC

This letter responds to an NRC request for bases to support the BWR Owners' Group contention that the upcoming February 17, 1993 meeting (review and tour) on water level testing be proprietary.

Some of the information to be covered will disclose a process or method to acquire accurate and valuable test data including the apparatus necessary to obtain such data. Prevention of its use by non-participant competitors and organizations without license constitutes a competitive economic advantage over other non-participants.

Some of the information consists of preliminary supporting data and analyses, including test data (bench-top and de-gas), relative to the phenomenon, its important process or method attributes, and the apparatus necessary to accurately acquire the application data which provide a competitive economic advantage for optimizing plant modification solutions.

Such information, if used by a non-participant, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product.

Some of the information will reveal commercial strategies that customers or suppliers could use to their advantage.

Some of the information discloses potentially patentable subject matter for which it may be desirable to obtain patent protection.

Some of the information must be treated as proprietary according to agreements with other parties, which may or may not be direct participants to this BWROG program.

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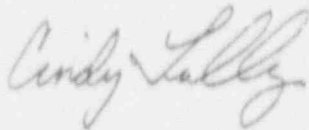
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Please call me or George Beck (PECo) if you have any questions about any of the above bases.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Cindy Tully".

Cynthia L. Tully, Chairperson
BWR Owners' Group

GBS/CLT/gbs

cc: L. A. England, BWROG Vice Chairman
G. J. Beck, Water Level Committee Chairman
T. G. Best, Water Level Committee Vice Chairman
BWROG Water Level Committee
S. J. Stark, GE
G. B. Stramback, GE

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