

EXXON NUCLEAR COMPANY, INC.

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December 23, 1985

RAC:082:85

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

SUBJECT: Transmittal of XN-75-27(P), Supplement 4

Ref.: XN-75-27(P), Supplement 4, "Exxon Nuclear Neutronics Design
Methods for Pressurized Water Reactors, Supplement 4," Exxon
Nuclear Company, December, 1985.

Dear Mr. Denton:

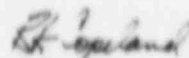
Enclosed are twenty-two (22) copies of the referenced report for your review and approval. This report extends the Exxon Nuclear pressurized water reactor neutronics methodology for gadolinia bearing fuel and provides justification for the use of the CASMO code for fuel neutronics analysis.

Exxon Nuclear Company considers information contained in the referenced topical report to be proprietary. In accordance with the Commission's Regulation 10 CFR 2.790(b), the enclosed Affidavit executed by Mr. H. E. Williamson of Exxon Nuclear Company provides the necessary information to support the withholding of the referenced topical report from public disclosure. A non-proprietary version will be provided separately.

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.

Sincerely,

8512300069 851223
PDR TOPRP EMVEXXN
C PDR



R. A. Copeland
Reload Licensing

mln
Enclosure

cc: Mr. H. Bernard (NRC)
Mr. W. O. Miller (NRC)
Mr. R. Lobel (NRC) (w/encl.)
Mr. M. Duenenfeld (NRC) (w/encl.)

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A F F I D A V I T

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

I, H. E. Williamson 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-75-27(P), Supplement 4 entitled "Exxon Nuclear Neutronics Design Methods for Pressurized Water Reactors, Supplement 4" 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 the Exxon Nuclear neutronics methodology 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 the Exxon Nuclear neutronics methodology 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 the Exxon Nuclear neutronics methodology developed by ENC over the past several years. ENC has invested millions of dollars and many man-years of effort in developing the the Exxon Nuclear neutronics methodology 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.

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

FURTHER AFFIANT SAYETH NOT.

H. E. Williamson

SWORN TO AND SUBSCRIBED

before me this 20th day of

December, 1985.

Glenn R. Fitzgerald

NOTARY PUBLIC