



January 20, 2000
LD-2000-0006

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Transmittal of Supplemental Meeting Slides (Proprietary Information)

Reference: Letter, I. C. Rickard (ABB) to U.S. NRC, "Transmittal of Meeting Slides concerning Corrosion Behavior of OPTIN Cladding at Calvert Cliffs," LD-1999-063, December 15, 1999.

By means of the Reference letter, ABB Combustion Engineering Nuclear Power, Inc. (ABB) transmitted copies of meeting slides used during discussions with the staff on December 14, 1999. Several of these slides contain information that originally was deemed proprietary but subsequently has been determined to be non-proprietary. One copy of these revised proprietary and non-proprietary slides are forwarded herewith as replacements for those provided in the reference letter. Please destroy the original copies of the meeting slides that are replaced by the enclosed.

Certain information contained in this transmittal is proprietary in nature. It is requested that this information be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and that it be appropriately safeguarded. The reasons for the classification of this information as proprietary are delineated in the affidavit, copy attached, that was submitted with the reference letter.

Please feel free to contact Virgil Paggen of my staff at 860-285-4700 or me if you have any questions.

Sincerely,

Ian C. Rickard, Director
Nuclear Licensing

Enclosure: As stated
copy w/encl: J. S. Cushing (NRR/DLPM/LPD4)
A. W. Dromerick (NRR/DLPM/LPD1)

ABB C-E Nuclear Power, Inc.

2000 Day Hill Rd. Windsor, CT 06095-0500

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I, Ian Rickard, depose and say that I am the Director, Nuclear Licensing, of ABB C-E Nuclear Power, Inc. (ABB), duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and described below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

I have personal knowledge of the criteria and procedures utilized by ABB in designating information as a trade secret, privileged, or as confidential commercial or financial information. The information for which proprietary treatment is sought, and which document has been appropriately designated as proprietary, is contained in the following:

- *"Corrosion Behavior of OPTIN Cladding at Calvert Cliffs," Meeting Slides dated December 14, 1999.*

Pursuant to the provisions of paragraph (b)(4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure is owned and has been held in confidence by ABB. It consists of technical data and post-exposure evaluation results of OPTIN-clad fuel bundles.
2. The information consists of summary data or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to ABB.
3. The information is of a type customarily held in confidence by ABB and not customarily disclosed to the public.
4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.
5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements that provide for maintenance of the information in confidence.
6. Public disclosure of the information is likely to cause substantial harm to the competitive position of ABB because:
 - a. A similar product is manufactured and sold by major competitors of ABB.
 - b. Development of this information by ABB required hundreds of thousands of dollars and thousands of manhours of effort. A competitor would have to undergo similar expense in generating equivalent information.
 - c. The information consists of technical data and qualification information for ABB-supplied products, the possession of which provides a competitive economic advantage. The availability of such information to competitors would enable them to design their product to better compete with ABB, take marketing or other actions to improve their product's position or impair the position of ABB's product, and avoid developing similar technical analysis in support of their processes, methods or apparatus.
 - d. In pricing ABB's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of ABB's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

Sworn to before me this
8th day of December, 1999



Ian C. Rickard
Director, Nuclear Licensing



Laurie J. White
Notary Public
My commission expires: 8/31/04

Enclosure to LD-2000-0006
January 20, 2000

Insertion Instructions

Replace Proprietary Slide Numbers 11, 12, 29 and 45 submitted via ABB Memo LD-1999-0063 (12/15/99) with the attached corresponding proprietary slide. Replace Proprietary Slide No. 26, with the attached Non-Proprietary Slide No. 26. Slide No. 26 is declassified in its entirety.

Insertion Instructions

Replace Non-Proprietary Slide Numbers 11, 12, 26, 29 and 45 with the attached corresponding non-proprietary slide.

Low Duty Observations

- Three Cycle Assembly
- []
- Measured Oxide []
- No Blistering/Spalling

High Duty Observations

- Two Cycle Assemblies
- []
- Accuracy of Oxide Predictions Dependent on []
- Blistering/Slight Spalling Observed, []

Summary Of Observations

- Low Duty Fuel Exhibits Expected Corrosion Behavior
- High Duty Fuel Exhibits Variable Behavior
- Some Populations of Rods Exhibit Higher Than Expected Corrosion and Blistering/Spalling Behavior

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- Low Duty Fuel Exhibits Expected Corrosion Behavior
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Root Cause Conclusions

- Factors Such as [] Not Identified as Primary Contributors
- Factors Affecting Fuel Duty (Time and Cladding Temperature) Are Primary Contributors

Fuel Duty Comparisons

- Fuel Duty Comparisons Were Made Between CC2N and Past & Current Batches
- A Preliminary Fuel Duty Model Was Developed by ABB-CENP Which Uses an Improved Corrosion Model
- A Fuel Duty Index Was Evaluated Which is an [Temperature and Time]
- Results Show That Fuel Duties are Similar to CC2N for Current Cycles