



**Pacific Gas and  
Electric Company**

**Lawrence F. Womack**  
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PG&E Letter DCL-00-029

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Mr. Samuel J. Collins

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2

Application for Withholding Proprietary Information from Public Disclosure  
WCAP-15128, "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented  
TSP Intersections," Revision 2 (Proprietary), February 2000, and WCAP-15129,  
"Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP  
Intersections," Revision 2 (Non-Proprietary), February 2000

Dear Mr. Collins:

The proprietary information for which withholding is being requested in the above-referenced report is further identified in the enclosures to this letter. The affidavit which accompanies this letter, signed by the owner of the proprietary information, Pacific Gas and Electric, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.790 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Tennessee Valley Authority for the Sequoyah Nuclear Plant, Docket Numbers 50-237 and 50-238.

Correspondence with respect to the proprietary aspects of the application for withholding or the PG&E affidavit should reference this letter, DCL-00-029, and be addressed to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "L.F. Womack". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Lawrence F. Womack

cc: Edgar Bailey  
Steven D. Bloom  
Ellis W. Merschoff  
David L. Proulx  
Diablo Distribution

Enclosure

GRC/



means of a lower case letter "g" located as a superscript immediately following the brackets. This lower case letter refers to the types of information Pacific Gas and Electric Company customarily holds in confidence identified in this affidavit pursuant to 10 CFR 2.790(b)(1).

- (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Pacific Gas and Electric Company.
- (ii) The information is of a type customarily held in confidence by Pacific Gas and Electric Company and not customarily disclosed to the public. Pacific Gas and Electric Company has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Pacific Gas and Electric Company policy and provides the rational basis required.

Under that system, information is held in confidence if the unauthorized disclosure, modification, or destruction of this information would adversely impact Pacific Gas and Electric Company or could subject it to legal action and penalties. Generally, this information is intended for use only within Pacific Gas and Electric Company and access to it is restricted to authorized individuals and entities. This information is considered confidential because it falls into one of the following types:

- (a) Proprietary information is information in which Pacific Gas and Electric Company has property rights which can be protected via a patent, a copyright, or other legal action as in the case of trade secrets.
- (b) A trade secret is information that: (1) derives independent economic value, whether actual or potential, from being unknown to the public in general or to persons who can obtain economic value from its disclosure or use, and (2) is the subject of efforts to maintain its secrecy that are reasonable under the circumstances. Examples include formulas and processes, designs, plans, and strategies, computer software and databases, methods and expertise that produce a desired result in a manner unknown to others in the trade ("know-how"), operational information, customer lists, and market information.

- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.790, it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The confidential information sought to be withheld in this submittal is that which is marked by lower case letter "g" in WCAP-15128, "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP Intersections," Revision 2 (Proprietary), February 2000, and WCAP-15129, "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP Intersections," Revision 2 (Non-Proprietary), February 2000.

This information addresses matters which will enable Pacific Gas and Electric Company to license an alternate repair criteria (ARC) for steam generator tubes.

Further, this information has substantial commercial value. It consists of nondestructive examination (NDE) performance test data that is used to support development of the alternate repair criteria for steam generator tubing. Use of the performance test data by a competitor would reduce their expenditure of resources in licensing a similar alternate repair criteria for steam generator tubing.

Public disclosure of this confidential information is likely to cause substantial harm to the competitive position of Pacific Gas and Electric Company because it would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

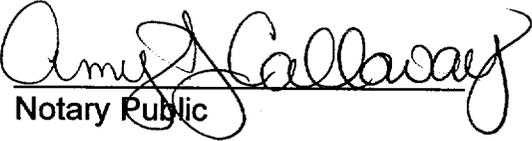
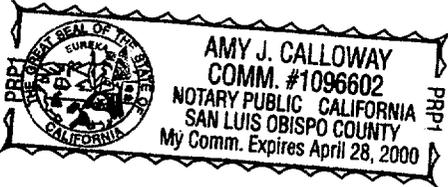
The development of the ARC is the result of applying the results of many years of experience in an intensive Pacific Gas and Electric Company effort and the expenditure of a considerable sum of money.

In order for competitors of Pacific Gas and Electric Company to duplicate this information, similar NDE performance testing would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.



Lawrence F. Womack  
Vice President  
Nuclear Technical Services

Subscribed and sworn to before me this 23rd day of February 2000  
County of San Luis Obispo  
State of California

  
Notary Public

Affidavit on behalf of Pacific Gas and Electric Company  
Affidavit consists of 4 pages total

ENCLOSURE 3

WESTINGHOUSE ELECTRIC COMPANY

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(WCAP 15128)

PROPRIETARY VERSIONS

ENCLOSURE 4

WESTINGHOUSE ELECTRIC COMPANY

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(WCAP 15129)

NONPROPRIETARY VERSIONS