

October 26, 2000

Document Control Clerk
U.S. Nuclear regulatory Commission
OWN 11555 Rockville Pike
Washington DC, 20555

Gentlemen:

Subject: Transmittal of EPRI Licensed Material for use in NRC Steam Generator Tube Integrity Program

This is a request under 10CFR2.790(a)(4) that the NRC withhold from public disclosure the information identified in the enclosed affidavit consisting of EPRI owned Proprietary Information identified in Attachment A of the affidavit. Copies of these Reports, when available, and the affidavit in support of this request will be supplied to Joe Muscara of the NRC Research Division, Dwight Diercks of Argonne National Laboratory, and Dr. Roger Staehle, contractor to Argonne National Laboratory. For information only, non-licensable EPRI reports, identified in Attachment B, will also be supplied to the above individuals, for potential use in the NRC program.

EPRI desires to disclose the Reports in confidence to the NRC as a means of exchanging information in support of the NRC Steam Generator Tube Integrity Program being performed at Argonne National Laboratory. Further, EPRI welcomes any discussion with the NRC regarding these Reports that the NRC desires to conduct.

The licensable Reports are for the NRC's internal use and may be used only for the purposes for which it is disclosed by EPRI. The Reports should not be otherwise used, copied, or disclosed to any person outside the NRC without prior written permission from EPRI.

If you have any questions about the legal aspects of this request for withholding, please do not hesitate to contact me at (650) 855-2997. Questions on the contents of the Reports should be directed to Allan R. McIlree of EPRI at (650) 855-2092.

Sincerely,



Theodore U. Marston
Vice President & Chief Nuclear Officer

Enclosures (3)
c: Licensing

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AFFIDAVIT

RE: "Transmittal of EPRI Licensed Material for use in NRC Steam Generator Tube Integrity Program

I, Theodore Marston, being duly sworn, depose and state as follows:

I am Vice President and Chief Nuclear Officer at the Electric Power Research Institute ("EPRI") and I have been specifically delegated responsibility for the reports listed in Attachment A that are sought under this affidavit to be withheld (the "Reports") and authorized to apply for their withholding on behalf of EPRI. This affidavit is submitted to the Nuclear Regulatory Commission ("NRC") pursuant to 10 CFR 2.790 (a)(4) based on the fact that the Report consists of trade secrets of EPRI and that the NRC will receive the Report from EPRI under privilege and in confidence.

The basis for withholding such Reports from the public is set forth below:

(i) The Report has been held in confidence by EPRI, its owner. All those accepting copies of the Report must agree to preserve the confidentiality of the Report.

(ii) The Reports are a type customarily held in confidence by EPRI and there is a rational basis therefor. The Report are a type, which EPRI considers as a trade secret(s) and is held in confidence by EPRI because to disclose it would prevent EPRI from licensing the Reports at fees, which would allow EPRI to recover its investment. If consultants and/or other businesses providing services in the electric/nuclear power industry were able to publicly obtain the Reports, they would be able to use it commercially for profit and avoid spending the large amount of money that EPRI was required to spend in preparation of these Reports. The rational basis that EPRI has for *classifying these Reports as trade secrets* is justified by the Uniform Trade Secrets Act, which California adopted in 1984 and which has been adopted by over twenty states. The Uniform Trade Secrets Act defines a "trade secret" as follows:

"Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that:

(1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and

(2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

(iii) These Reports will be transmitted to the NRC in confidence.

(iv) These Reports are not available in public sources. EPRI developed these Reports only after making a determination that the Reports were not available from public sources. It required a large expenditure of dollars for EPRI to develop the Reports. In addition, EPRI was required to use a large amount of time of EPRI employees. The money spent, plus the value of EPRI's staff time in preparing the Reports, show that the Reports are highly valuable to EPRI. Finally, the Reports were developed only after a long period of effort of at least several months.

(v) A public disclosure of any of these Reports would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to license these Reports both domestically and internationally. The Reports can only be acquired and/or duplicated by others using an equivalent investment of time and effort.

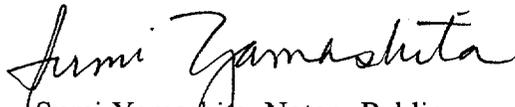
I have read the foregoing and the matters stated therein are true and correct to the best of my knowledge, information and belief. I make this affidavit under penalty of perjury under the laws of the United States of America and under the laws of the State of California.

Executed at 3412 Hillview Avenue, Palo Alto, being the premises and place of business of the Electric Power Research Institute:

September 20, 2000


Theodore Marston

Subscribed and sworn before me this day: September 20, 2000


Sumi Yamashita, Notary Public



**List of EPRI Licensed Reports For Potential
Use in NRC Steam Generator Tube Integrity Program**
(revised 10/12/00)

	<u>Report #</u>	<u>Title</u>
1.	NP-5558-SL, R1	"Boric Acid Application Guidelines for Intergranular Corrosion Inhibition (Revision 1)," December 1990
2.	NP-5561-CCM, V1, R1	"MULTEQ Chemistry Code: User's Manual," February, 1988 (SGRP)
3.	*NP-5561-CCM, V1, R2	"MULTEQ: Equilibrium of an Electrolytic Solution with Vapor-Liquid Partitioning and Precipitation," Vol. 1, User's Manual, Rev. 2, May 1989.
4.	*NP-6864-L-R2	"PWR Steam Generator Tube Plugging Limits: Technical Support Document for Expansion Zone PWSCC in Roll Transitions; Rev.2," June 1993.
5.	*NP-6864-R2	"PWR Steam Generator Tube Repair Limits: Technical Support Document for Expansion Zone PWSCC in Roll Transitions-REV2"; August 1993
6.	NP-7154	"Summary of BWR Owners Group Intergranular Stress Corrosion Cracking Research Program, 1979-80."
7.	NP-7238	"Effects of Induction Heating Stress Improvements on Ultrasonic Response From Intergranular Stress Corrosion Cracking", March 1991
8.	NP-7367S	"Investigation of Lead as a Cause of Stress Corrosion Cracking at Support Plate Intersections," June 1991.
9.	*NP-7370	"Examination of Kewaunee Steam Generator Tubes R4C81 and R11C9".
10.	NP-7469	"Residual Stress Analysis in Reactor Pressure Vessel Attachments: Review of Available Welding Simulation Software: Review"
11.	NP-7493	"Statistical Analysis of Steam Generator Tube Degradation", September 1991.
12.	NP-7494	"Hideout and Return of Complex Mixtures in Crevices", September 1991.
13.	NP-7532	"Modification of Alloy Surfaces Using Pulsed Energy", Oct 1991
14a.	TR-100359 Vols.1	"Nuclear Power Plant Resource Book: Volume 1," Feb. 1992.

14b.	*TR-100359 Vols.2	"Nuclear Power Plant Resource Book: Volume 2," Feb. 1992.
15.	TR-100407-R1	"PWR Steam Generator Tube Repair Limits-Technical Support Document for Outside Diameter Stress Corrosion Cracking at Tube Support Plates-Rev1.", August 1993
16.	*TR-100407- R2A	"PWR Steam Generator Tube Repair Limits-Technical Support Document for Outside Diameter Stress Corrosion Cracking at Tube Support Plates-Rev2A"; January 1995.
17.	TR-100651	"Residual Stress Analysis in BWR Pressure Vessel Attachments", Jun 1992
18.	TR-100658	"Stress Corrosion Cracking of Alloys 600 and 182 in BWR Environment Interim Report", May 1992
19.	TR-100852	"Proceedings: 1991 EPRI Workshop on PWSCC of Alloy 600 in PWRs", July 1992
20.	TR-100865	"Characterization of the Resistance to PWSCC of Hydraulic Tube-Tubesheet Expansions, RP-S406-12", July 1992.
21.	TR-101010	"Correlation of Secondary-Side IGA/SCC Degradation of Recirculating Steam Generator Tubing With the On-Line Addition of Boric Acid", 8/92.
22.	TR-101103	"Proceedings: 1991 EPRI Workshop on Secondary-Side Intergranular Corrosion Mechanisms", 8/92.
23.	TR-101105	"Remedial Actions for Acidic Sulfate Corrosion", 8/92.
24.	TR-101106	"Adsorption of Sulfate in PWR Steam Generators: Laboratory Tests", 8/92.
25.	TR-101427 Vols. 1,2,3	"Examination of Trojan Steam Generator Tubes: Volumes 1-3", Nov 1992
26.	*TR-102134-R4	PWR Secondary Water Chemistry Guidelines – Revision 4, November 1996
27.	*TR-102134-R5	PWR Secondary Water Chemistry Guidelines – Revision , 2000
28.	TR-103345	"Proceedings: 1992 EPRI Workshop on PWSCC of Alloy 600 in PWRs", Dec 1993
29.	TR-103566	"Statistical Analysis of Steam Generator Tube Degradation", July 1994.
30.	*TR-103756	"Examination of Crystal River Unit 3 Steam Generator Tube Sections", 4/94
31.	TR-103824	Steam Generator Reference Book, Volume 1, Dec. 1994.
32.	*TR-103901	Examination of Kewaunee Cold Leg Steam Generator II

33.	*TR-104045	Susceptability of Alloys 600 and 690 to Acidify Sulfate and Chloride Environments
34.	TR-104064	Alloy 690 Qualification: Corrosion Under Prototypic Heat Flux and Temperature Conditions", May 1995
35.	*TR-104473	Examination of Shearon Harris Steam Generator Tube Sections, March 1996
36.	*TR-104811-V1,V2,V3,V4	PWR Molar Ratio Control Application Guidelines, January 1995.
37.	TR-105406-P1	"Proceedings: 1994 EPRI Workshop PWSCC of Alloy 600 in PWR's; Part 1", August 1995.
38.	TR-105406-P2	"Proceedings: 1994 EPRI Workshop PWSCC of Alloy 600 in PWR's; Part 2"; August 1995.
39.	*TR-105983	Proceedings: 1995 EPRI Circumferential Cracking Workshop, A. McIlree, Dec. 1995 Licensable
40.	*TR-106048	"Characterization of PWR Steam Generator Deposits," February 1996.
41.	*TR-106212-V1	"Inhibition of IGA/SCC on Alloy 600 Surfaces Exposed to PWR Secondary Water", December 1997
42.	TR-106483	"Analysis of Steam Generator Tubing from Crystal River, Unit 3", September 1997.
43.	TR-106484	"Analysis of Steam Generator tubing from Oconee-1 Nuclear Station"; April 1997.
44.	*TR-108501	Predicted Tube Degradation for Westinghouse Models D5 and F Type Steam Generators; A. McIlress, September 1997 Licenseable
45.	TR-109138-P2	"Proceedings: 1997 EPRI Workshop on PWSCC of Alloy 600 in PWR's Part 2"; 1. November 1997
46.	*TR-113458	Initiation of Intergranular Stress Corrosion Cracking in Type 304 Stainless Steel and Alloy 600

- *Staeble does not have yet. All other reports Staeble already has a copy

ATTACHMENT B

**List of EPRI Non-Licensable Reports For Potential
Use in NRC Steam Generator Tube Integrity Program
(revised 10/12/00)**

	<u>Report No.</u>	<u>Title</u>
1.	*NP-3559	Solubility of Corrosive Salts in Dry Steam:, June 1984, T. Passell
2.	*NP-4223	Intergranular Attack of Alloy 600: Laboratory Investigations, August 1985 (II)
3.	*NP-4270	Effect of Boric Acid Treatment on the Secondary Cycle at ANO-2, Nov. 1985 (E)
4.	*NP-4272	Simulation of Intergranular Attack on Alloy 600 Tubing in Tubesheet Crevices, October 1985 (II)
5.	*NP-4563	Return of Hideout Chemicals in PWR Steam Generators During Power and Temperature Reductions, May 1986 (I)
6.	*NP-4745-LD	Examination of Tubes R4C19HL, R6C18HL, and R16c33HL From Steam Generator 12 of the Prairie Island Nuclear Station Unit 1, August 1986 (II)
7.	*NP-5156	Sulfate Hideout in Heated Crevices, July 1987
8.	*NP-5265	Hideout of Sodium Salts in Tubesheet Crevices, July 1987
9.	*NP-5828	Proceedings: Workshop on Initiation of Stress Corrosion Cracking Under LWR Conditions; I. Nelson, D. Cubbicciotti
10.	*NP-5660-LD	Point Beach-1 Tubesheet Crevice Chemistry, February 1988 (II)
11.	*NP-6115-SD	"Intergranular Attack of Alloy 600: Simulation and Remedial Action Tests," February, 1989.
12.	*NP-6710-LD	Proceedings: Workshop on the Role of Sulfur Species on the M Secondary-Side Degradation of Alloy 600 and Related Alloys, March 1990
13.	*NP-7136	SD Destructive Examination of Steam Generator 11 Tubing at Calvert Cliffs Power Plant Unit 1, April 1991, J.P.M. Paine
14.	*NP-7346	SD "Acid Sulfate Corrosion in PWR Steam Generators, June 1991 P. Paine
15.	*NP-7347	Rvieu of Field Use and Corrosion Experience with Phosphate Chemistry in Nuclear Steam Generators, June 1991
16.	*TR-102134-R1	PWR Secondary Water Chemistry Guidelines – Revision 1,
17.	*TR-102134-R2	PWR Secondary Water Chemistry Guidelines – Revision 2,
18.	TR-102134-R3	PWR Secondary Water Chemistry Guidelines – Revision 3, May 1993
19.	*TR-104066	Oxide Film Compositions on Alloy 600 Tubes from Steam Generators: Palo Verde and Saint Laurent, April 1998, Research Ended April 1997

20.	*TR-106212-V2	"Inhibition of IGA/SCC on Alloy 600 Surfaces Exposed to PWR Secondary Water, Titanium and Cerium Acetate Model Boiler Testing," June 1998
21.	*TR-106212-V3	"Inhibition of IGA/SCC on Alloy 600 Surfaces Exposed to PWR Secondary Water, Pre-cracking Model Boiler Tests", November 1998
22.	*TR-106365-R4	Steam Generator Progress Report: Rev. 14
23.	*TR-108755	Development of a Steam Generator Heated Crevice Monitor
24.	*TR-110803	Sodium Chloride Hideout In a Simulated Steam Generator Tube and Tube Support Place Crevice, Jun 1998, Research Ended May 1998
25.	*TR-112110	Ringhals 3 TSP Crevice and Tube Deposit, Mar. 1999
26.	*TR-112481	1996 Surface Chemistry Workshop, March 1999
27.	*TR-112748	Capsule Corrosion Tests in Acid Environments, April 1999
28.	*TR-112775	PbSCC of Alloy 690, May 1999
29.	*TR-112776	Film of Alloy 690, May 1999
30.	*TR-112815	Proceedings: 1999 EPRI Workshop on Startup Oxidant Control: Chattanooga, TN, Jan. 19-20, 1999.
31.	*TR-112967	"Source Book on Limiting Exposure to Startup Oxidants," September 1999

- *Staehele does not have yet. All other reports Staehele already has a copy.