



NUCLEAR ENERGY INSTITUTE

Alexander Marion
DIRECTOR
ENGINEERING DEPARTMENT
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July 31, 2001

Dr. Brian W. Sheron
Associate Director for Project Licensing and Technical Analysis
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O5-E7
Washington, DC 20555-0001

SUBJECT: NRC Staff Questions on EPRI Interim Report TP-1001491, Part 2,
Section 4.0, Comment No. 2

PROJECT NUMBER: 689

Dear Dr. Sheron:

Enclosed is the information requested by the NRC for data on U.S. PWR plants, and a relative ranking of effective full power years of operation and RPV head temperature normalized to Oconee, Unit 3. Proprietary and non-proprietary versions of the table are enclosed along with an affidavit requesting that the NRC withhold the proprietary version from public distribution. The data is the most accurate available at this time, but it is possible that changes to some of the data may occur in the future.

If you have any questions about the enclosures, please contact Kurt Cozens at 202-739-8085, koc@nei.org, or me.

Sincerely,

Alexander Marion

KOC/maa
Enclosures

c: Mr. Jack R. Strosnider, U. S. Nuclear Regulatory Commission
Mr. Jacob I. Zimmerman, U. S. Nuclear Regulatory Commission

July 31, 2001

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

Subject: Table 1. Key Plant Parameters for PWR Reactor Vessel Head Nozzle PWSCC
Assessments (July 2001)

Gentlemen:

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 above (the "Document"). Copies of the Document and the affidavit in support of this request are enclosed.

EPRI desires to disclose the Document in confidence to the NRC as a means of exchanging information with the NRC staff for the purpose of supporting generic regulatory improvements related to the management of the MRP Alloy 82/182 weld integrity. EPRI welcomes any discussion with the NRC regarding the Document that the NRC desires to conduct.

The Document is for the NRC's internal use and may be used only for the purposes for which it is disclosed by EPRI. The Document should not be otherwise used 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 Documents should be directed to Mr. Al McIlree of EPRI at (650) 855-2092.

Sincerely,


Theodore U. Marsjon, Ph.D.
Vice President & Chief Nuclear Officer

Enclosures

c: Licensing



AFFIDAVIT

RE: Table 1. Key Plant Parameters for PWR Reactor Vessel Head Nozzle PWSCC Assessments (July 2001)

I, ROBIN L. JONES, being duly sworn, depose and state as follows:

I am a Vice President at the Electric Power Research Institute ("EPRI") and I have been delegated responsibility for the Document listed above that is sought under this affidavit to be withheld (the "Document") 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 Document consists of trade secrets of EPRI and that the NRC will receive the Document from EPRI under privilege and in confidence.

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

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

(ii) The Document is a type customarily held in confidence by EPRI and there is a rational basis therefore. The Document is 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 Document 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 Document, 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 the Document. The rational basis that EPRI has for classifying this/these Document(s) as a 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.

EPRI

(iii) The Document will be transmitted to the NRC in confidence.

(iv) The Document is not available in public sources. EPRI developed the Document only after making a determination that the Document was not available from public sources. It required a large expenditure of dollars for EPRI to develop the Document. 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 Document, show that the Document is highly valuable to EPRI. Finally, the Document was developed only after a long period of effort of at least several months.

(v) A public disclosure of the Document would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to license the Document both domestically and internationally. The Document 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 American and under the laws of the State of California.

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

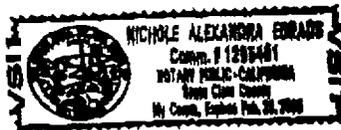
July 31, 2001


Robin L. Jones

Subscribed and sworn before me this day:

July 31, 2001


Nichole Alexandra Edraos, Notary Public



Key Plant Parameters for PWR Reactor Vessel Head Nozzle PWSCC Assessments (July 2001)

Rank	Unit Name	Design and Fabrication				Operating Time and Temperature					Next Scheduled Refueling Outage Date	Bare-Metal Visual or ID NDE	Date	Full / Partial	Previous Inspection Status	
		NSSS Design	Nozzle Material ¹ Supplier	Head Fabricator ²	Design Diametral Nozzle Interference Fit (mils)	Insulation Type and Config.	Head Temp. Range thru Feb. 2001	Current Head Temp. (°F)	EFPYs thru Feb. 2001	Remain. EFPYs to Reach Oconee 3 Norm. from 3/1/01 ³					Histogram Group (EFPYs) ³	Result
Content Deleted – MRP/EPRI Proprietary Information																

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Content Deleted – MRP/EPRI Proprietary Information																	

NOTES:

¹Key for Material Suppliers:
 B = B&W Tubular Products
 H = Huntington
 S = Sandvik
 SS = Standard Steel
 W = Westinghouse (Huntington)
 CL = C.L. Imphy
 A = Aubert et Duval

²Key for Head Fabricators:
 BW = B&W
 CBI = Chicago Bridge & Iron
 CE = Combustion Engineering
 RDM = Rotterdam Dockyard
 CL = C.L. Imphy

³Calculated using a thermal activation energy of 50 kcal/mole.