



April 18, 2002  
NRC:02:019

Document Control Desk  
ATTN: Chief, Planning, Program and Management Support Branch  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

### UT Inspection Technique

The NRC made a visit to Framatome ANP on February 12, 2002, to discuss a UT inspection technique called the "leak path detection method." Framatome reviewed the technique and showed the results of inspections made at two nuclear power plants. Following the visit the NRC requested a copy of some of the information they had reviewed.

The information requested includes three types of documentation: (1) proprietary internal evaluations, (2) proprietary descriptions of the technique, and (3) proprietary results that are owned by the utilities where the inspections were conducted. The first set of documents are those that Framatome classifies for internal use only; the NRC is invited to review these documents at our facilities, which in this case was done. Framatome believes it is appropriate to provide a document equivalent to the second set of information. The third set of documents would have to be requested from the utilities involved in the inspections.

Enclosed with this letter is a proprietary excerpt from a presentation that describes the UT technique called the leak path detection method. This presentation incorporates some elements of the inspection results and is intended to help satisfy the NRC's request for this type of information.

Framatome considers the enclosed information to be proprietary. As required by 10CFR2.790(b), an affidavit is enclosed to support the withholding of this information from public disclosure.

Very truly yours,

A handwritten signature in black ink, appearing to read 'James F. Mallay'.

James F. Mallay, Director  
Regulatory Affairs

/lmk

Enclosure

**Framatome ANP, Inc.**

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Handwritten initials 'JMS' in black ink, located in the bottom right corner of the page.

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cc: D. G. Holland  
W. E. Norris  
T. L. Chan  
Project 693



6. The following criteria are customarily applied by FRA-ANP to determine whether information should be classified as proprietary:

- (a) The information reveals details of FRA-ANP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FRA-ANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FRA-ANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FRA-ANP, would be helpful to competitors to FRA-ANP, and would likely cause substantial harm to the competitive position of FRA-ANP.

7. In accordance with FRA-ANP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside FRA-ANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FRA-ANP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

James F. Mally

SUBSCRIBED before me this 17<sup>th</sup>  
day of April, 2002.

Ella F. Carr-Payne

Ella F. Carr-Payne  
NOTARY PUBLIC, STATE OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/05

