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10 CFR 50
10 CFR 51
10 CFR 54

2130-06-20360
July 7, 2006

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

Oyster Creek Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Subject: Supplemental Information Related to the Aging Management Program for the Oyster Creek Drywell Shell, Associated with AmerGen's License Renewal Application (TAC No. MC7624)

- References:**
1. NRC's "Request for Additional Information for the Review of the Oyster Creek Nuclear Generating Station, License Renewal Application (TAC 7624)", dated March 10, 2006
 2. AmerGen's "Response to NRC Request for Additional Information, dated March 10, 2006, Related to Oyster Creek Generating Station License Renewal Application (TAC No. 7624)," dated April 7, 2006
 3. NRC's "Summary of Meeting Held on June 1, 2006, Between the U.S. Nuclear Regulatory Commission Staff and AmerGen Energy Company, LLC Representatives to Discuss the Staff's Questions Regarding the Drywell Shell and the Oyster Creek Nuclear Generating Station License Renewal Application," dated June 9, 2006 (ADAMS # ML061600368)

In Reference 1, as part of its review of the AmerGen Energy Company (AmerGen) application for license renewal for Oyster Creek Generating Station (Oyster Creek), the NRC Staff requested additional information regarding the aging management program and activities associated with the Oyster Creek drywell containment shell. Reference 2 provided AmerGen's response to these RAIs.

On June 1, 2006, the NRC Staff held a public meeting with representatives from AmerGen to further discuss the drywell aging management program. At that meeting, the Staff posed several specific clarifying questions to AmerGen, as documented in Reference 3. The Staff also indicated that it plans to conduct an engineering analysis of the drywell to confirm the results of General Electric (GE) analysis submitted to the NRC in 1991 and resubmitted in response to RAI 4.7.2-1 (b), Reference 2. Attachment 1 of this letter provides construction drawings requested by the Staff to support its analysis of the containment drywell.

A114

July 7, 2006

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Attachment 1 begins with the list of drawings contained in Attachment 1, followed by the submitted drawings. These drawings contain information proprietary to Chicago Bridge & Iron Company (CB&I). On behalf of CB&I, AmerGen requests that the documents be withheld from public disclosure in accordance 10 CFR 2.390 (a)(4). An affidavit supporting this request is included as Attachment 2.

Attachment 3 contains additional drawings that are not considered proprietary, and are therefore grouped as a separate attachment.

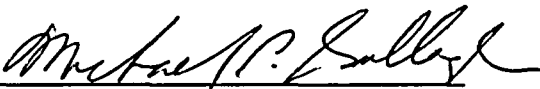
If you have any questions, please contact Fred Polaski, Manager License Renewal, at 610-765-5935.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on

07-07-2006


Michael P. Gallagher
Vice President, License Renewal
AmerGen Energy Company, LLC

Attachment 1. Oyster Creek Containment Fabrication Drawings - Proprietary
 2. Chicago Bridge & Iron Company - Proprietary Affidavit
 3. Oyster Creek Containment Drawings – Non-Proprietary

cc: Regional Administrator, USNRC Region I, w/o Enclosures
 USNRC Project Manager, NRR - License Renewal, Safety, w/Enclosures
 USNRC Project Manager, NRR - License Renewal, Environmental, w/o Enclosures
 USNRC Project Manager, NRR - Project Manager, OCGS, w/o Enclosures
 USNRC Senior Resident Inspector, OCGS, w/o Enclosures
 Bureau of Nuclear Engineering, NJDEP, w/Enclosures
 File No. 05040

ATTACHMENT 2

AFFADAVIT SUPPORTING CHICAGO BRIDGE AND IRON REQUEST TO
TREAT DRAWINGS (IN ATTACHMENT 1) AS PROPRIETARY

3 PAGES

AFFIDAVIT

I, **Ned A. Bacon**, state as follows;

(1) I am the Chief Engineer of Chicago Bridge & Iron Company (“CB&I”) and have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.

(2) The information sought to be withheld is contained in the attachment, “Attachment – List of Selected Oyster Creek Containment Fabrication Drawings”.

(3) In making this application for withholding of proprietary information of which it is the owner of licensee, CB&I relies upon the exemption from disclosure set forth in the Freedom on Information Act (“FOIA”), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and the NRC regulations 10 CFR 9.17(a)(4) and 2.390(a)(4) for “trade secrets and commercial or financial information obtained from a person and privileged or confidential” (Exemption 4). This material for which exemption from disclosure is here sought is all “confidential commercial information,” and some portions also qualify under the narrower definition of “trade secret,” within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).

(4) Some examples of categories of information which fit into the definition of proprietary information are:

a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by CB&I’s competitors without license from CB&I constitutes a competitive economic advantage over other companies;

b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product;

c. Information which reveals cost or price information, production capacities, budget levels, or commercial strategies of CB&I, its customers, or its suppliers;

d. Information which reveals aspects of past, present, or future CB&I customer-funded development plans and programs, of potential commercial value to CB&I;

e. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs (4)a, (4)b and (4)d, above.

(5) To address the 10 CFR 2.390 (b) (4), the information sought to be withheld is being submitted to NRC in confidence. The information is of a sort customarily held in confidence by CB&I, and is in fact so held. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in (6) and (7) following. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by CB&I, no public disclosure has been made, and it is not available in public sources.

(6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge, or subject to the terms under which it was licensed to CB&I.

(7) The procedure for approval of external release of such document typically requires review by the staff engineer, project manager, chief engineer or other equivalent authority, by the manager of the cognizant marketing function (or his delegate), and by Legal, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside CB&I are limited to regulatory bodies, customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information.

(8) The information identified in paragraph (2) is classified as proprietary because it contains details of CB&I's containment vessel design and fabrication methodology.

The development of the containment vessel design and fabrication methodology, along with testing, development and approval of supporting methodologies was achieved at a significant cost, on the order of several million dollars, to CB&I or its licensor.

(9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to CB&I's competitive position and foreclose or reduce the availability of profit-making opportunities. The containment vessel design and fabrication methodology is part of CB&I's comprehensive technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the design and fabrication drawings, and includes development of the expertise to determine and apply appropriate methodologies.

The research, development, engineering, analytical and NRC review costs comprise a substantial investment of time and money by CB&I or its licensor.

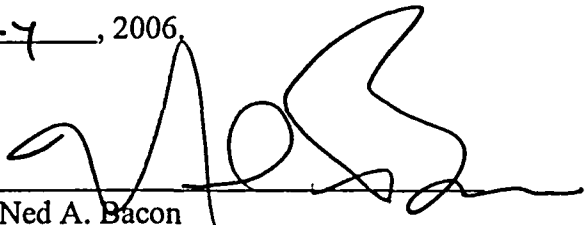
The precise value of the expertise to devise a containment vessel design and fabrication methodology is difficult to quantify, but it clearly is substantial.

CB&I's competitive advantage will be lost if its competitors are able to use the results of the CB&I experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to CB&I would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive CB&I of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing and obtaining the containment vessel design and fabrication methodology.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information, and belief.

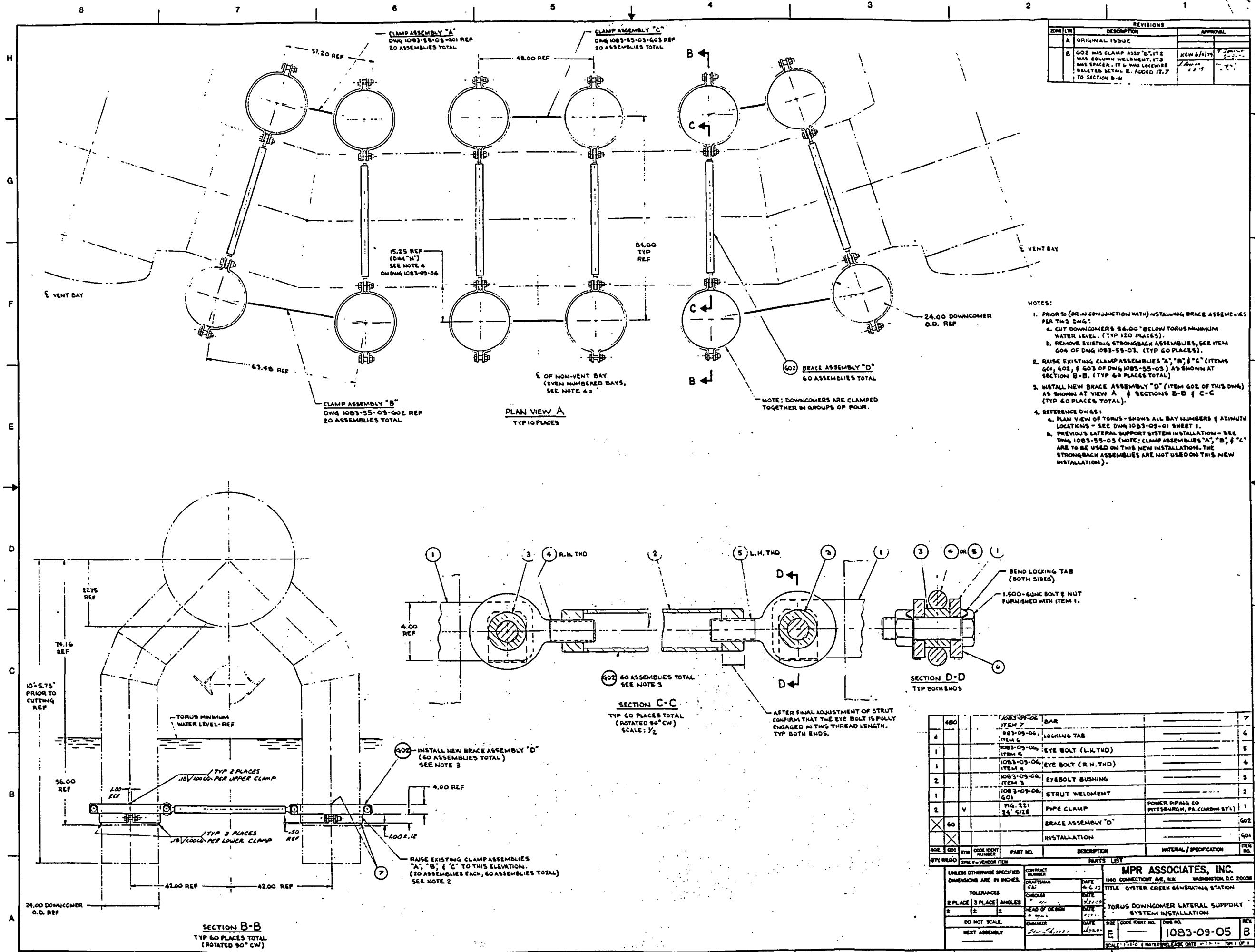
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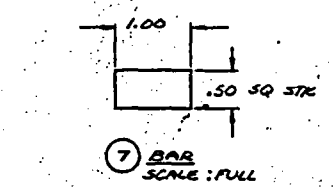
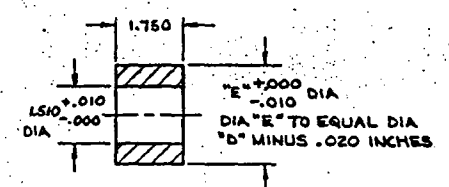
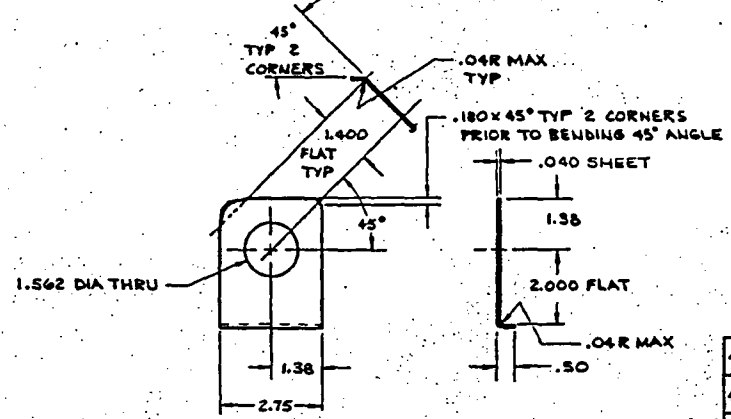
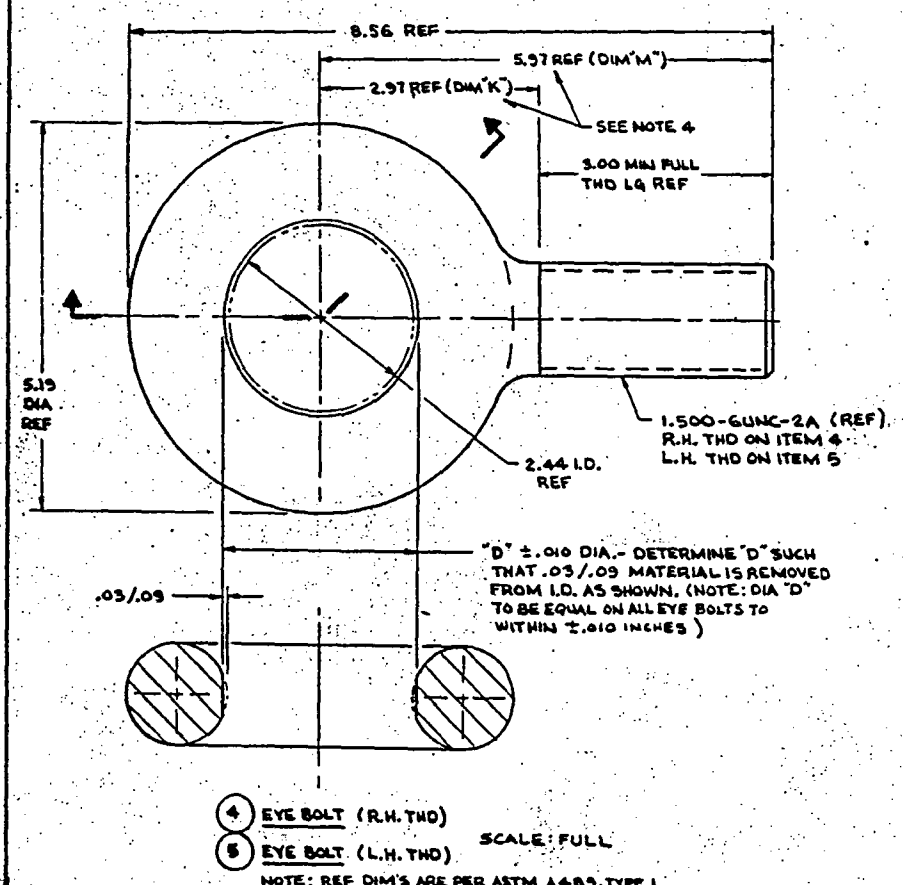
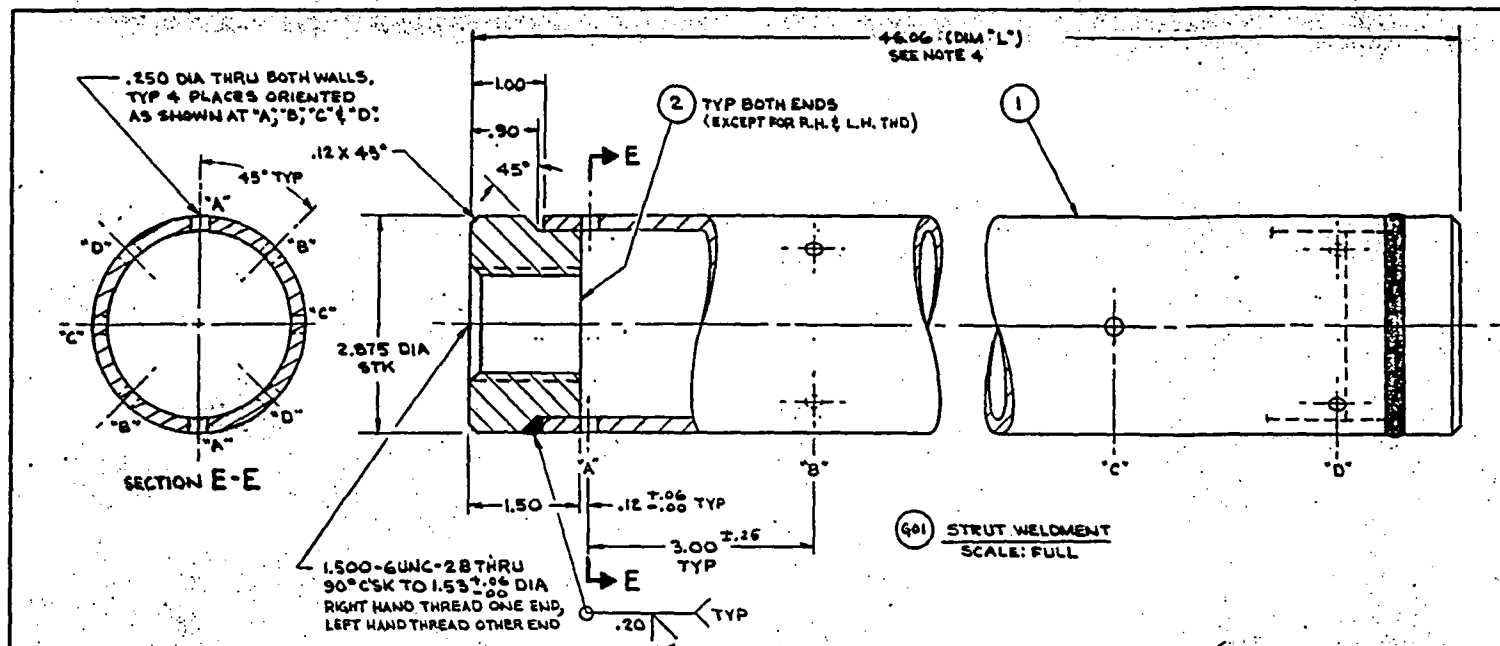


Ned A. Bacon
Chicago Bridge & Iron Company

Attachment 3—Oyster Creek Containment Drawings
Non-Proprietary

| | | | |
|------------|---|---|---|
| 1083-09-05 | 1 | B | Torus Downcomer Lateral Support System Installation |
| 1083-09-06 | 1 | B | Torus Downcomer Lateral Support System Details |
| 1083-09-07 | 1 | D | Vent Header Replacement Support Columns Fabrication and Installation |





| REV | DESCRIPTION | DATE | BY | CHKD |
|-----|---|--------|----------|------------|
| A | ORIGINAL ISSUE | | | |
| B | 601 WAS "COLUMN WELDMENT", ITEM 3 WAS "SPACE". I ADDED OPTIONAL MAT'L TO IT. I, THE L750 DIM WAS 1.800 ON IT. IN NOTE 2 JCP/L SPEC WAS LPR SPEC 88-09-02 ADDED IT. 6. ADDED IT. 7 | 6/4/79 | K. WHITE | J. Johnson |
| | | 6-8-79 | | |
| | | 6-8-79 | | |

- NOTES:
- INTERPRET DWG PER ANSI Y14 WITH DIMENSIONING & TOLERANCING PER ANSI Y14.5.
 - UNLESS OTHERWISE SPECIFIED:
 - EDGES - .01 TO .03 RADIUS OR CHAM
 - MACHINE SURFACES - 250
 - STOCK SURFACES - 250
 - MANUFACTURE, INSPECT, & CLEAN PER JCP/L SPEC 125.2-1
 - PRIOR TO FABRICATING 601 TO THE 46.06 LENGTH (DIM "L"), CONFIRM THE 15.25 CLAMP DIM (DIM "M") SHOWN AT PLAN VIEW A ON DWG 1083-09-05 AND THE 2.97 (DIM "K") & 5.97 (DIM "M") EYE BOLT DIM'S, IF ANY OF THESE DIM VARY BY MORE THAN .25 INCHES, RECALCULATE NEW LENGTH "L" AS FOLLOWS:
 $L = 85.50 - 2M - K - M$
 (USE MAX "K" & MIN "M" DIM OF ALL EYE BOLTS)
 - BRACE ASSEMBLY "D" (SEE DWG 1083-09-05) TOTAL AXIAL ADJUSTMENT IS ± 1.50 INCHES BASED ON THE 3.00 MIN FULL THD LENGTH OF EYE BOLT.

| QTY | DESCRIPTION | MATERIAL | STANDARD | ITEM NO. |
|-----|---|--|----------|----------|
| 480 | BAR, .50 SQ STK | ASME SA 36 | | 7 |
| 180 | LOCKING TAB | SST TYPE 304, ANNEALED | | 6 |
| 60 | EYE BOLT, PLAIN, 1.500-6UNC-2A, L.H. THD. | CLEVELAND CITY FORGE CO. CLEVELAND, OH. (OR EQUAL) | | 5 |
| 60 | EYE BOLT, PLAIN, 1.500-6UNC-2A, R.H. THD | (MACHINE I.D. AS SHOWN ON THIS DWG) | | 4 |
| 120 | EYE BOLT BUSHING | ASME SA 36 | | 3 |
| 2 | BAR, 2.875 DIA STK | ASME SA 36 | | 2 |
| 1 | PIPE, 2.50 SCH 40 | ASME SA 106 GR B, SA 333 GR 6, OR SA 333 GR B | | 1 |
| 60 | STRUT WELDMENT | | | 601 |

UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES.

TOLERANCES:
 2 PLACE 3 PLACE ANGLES
 ± .06 ± .03 ± 2°

DO NOT SCALE.

CONTRACT NUMBER: MPR ASSOCIATES, INC. 1400 CONNECTICUT AVE, N.E. WASHINGTON, D.C. 20002

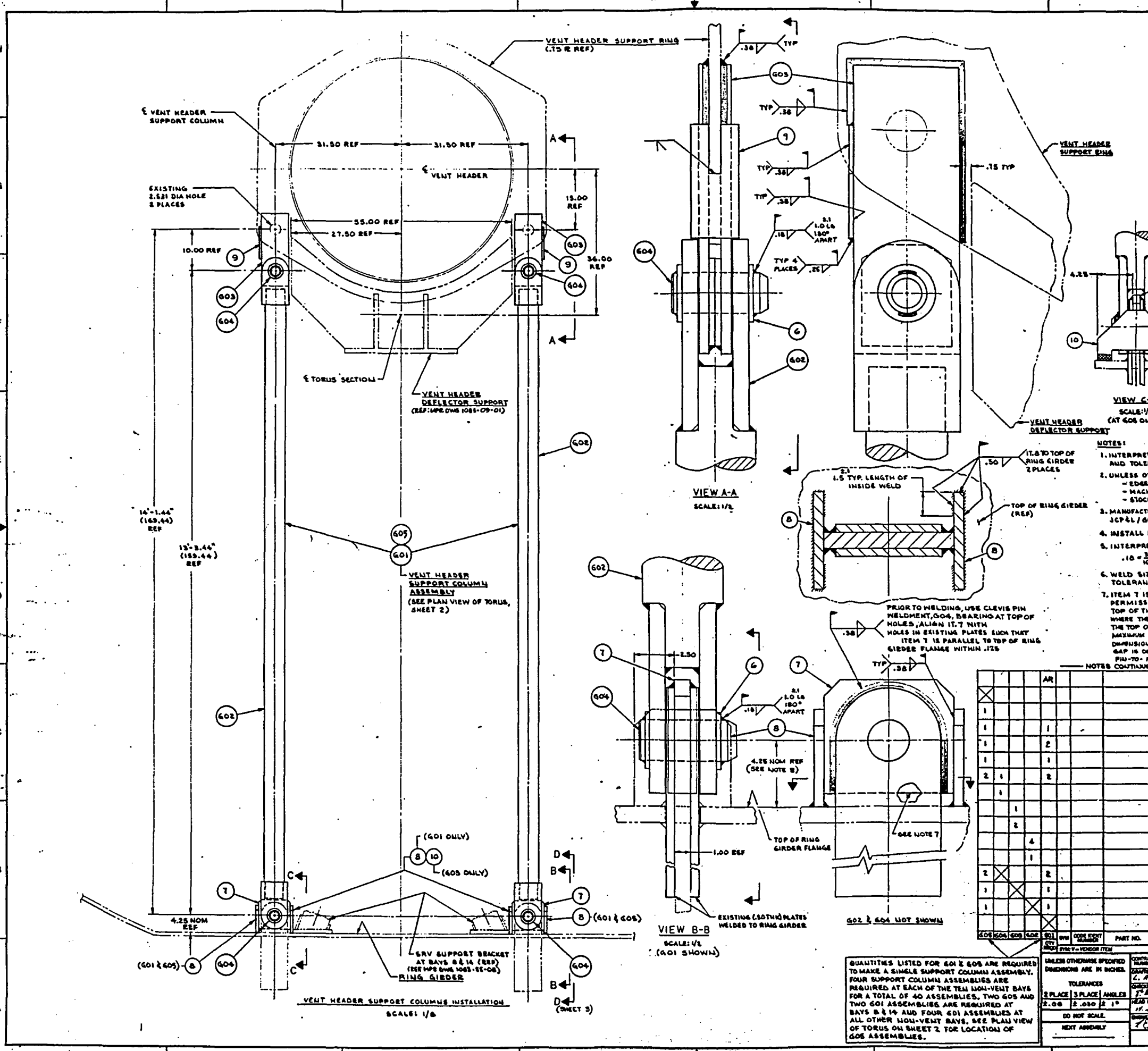
DATE: 9-10-79
 DRAWN BY: J. Johnson
 CHECKED BY: K. White
 HEAD OF DESIGN: W. G. L. L.
 DATE: 6-8-79

CONTRACT NO.: 1083-09-05

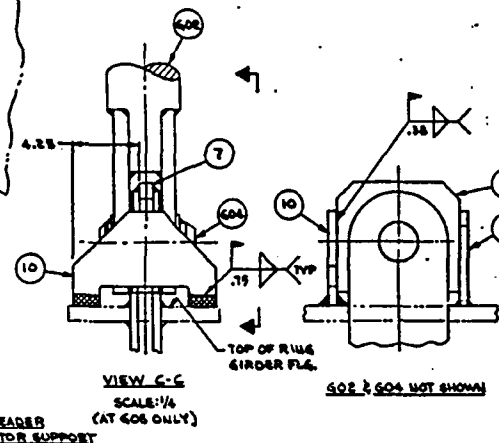
REV. NO.: D

REV. DATED: 1083-09-05

1083-09-05



| ZONE | REV | DESCRIPTION | APPROVAL |
|------|-----|---|----------|
| A | 1 | ORIGINAL ISSUE | |
| B | 2 | AT ZONE D-B, ADDED SECTION SHOWING .50 FIELD WELD OF IT, B TO RING GIRDER; ADDED NOTES 5, 6, 7; DELETED .38 WELD OF IT, B TO RING GIERDES | |
| C | 3 | ADDED: 603, ITEM 10 AND VIEW C-C. DELETED QUANTITIES WERE | |
| D | 4 | ADDED SHEET 3; ADDED SECT. B-B AND ITEM 11; MODIFIED NOTES 5, 7; DELETED DIM(6) .38 WELD FROM VIEW B-B & C-C | |



- NOTES:**
- INTERPRET DRAWING PER ANSI Y14 WITH DIMENSIONING AND TOLERANCING PER ANSI Y14.5.
 - UNLESS OTHERWISE SPECIFIED:
 - EDGES .04 TO .03 RADII OR CHAMFER
 - MACHINED SURFACES 250 PER ANSI B46-1
 - STOCK SURFACES AS PURCHASED
 - MANUFACTURE, INSPECT AND PAINT IN ACCORDANCE WITH JCP&L/OPU PROCUREMENT SPEC 125.18-1.
 - INSTALL PER JCP&L/OPU INSTALLATION SPEC OC-16-40239-001.
 - INTERPRET WELD SIZES AS FOLLOWS:
 - .10 = $\frac{3}{16}$.31 = $\frac{5}{16}$.38 = $\frac{3}{8}$
 - WELD SIZES ARE TO BE INTERPRETED AS MINIMUM SIZES. TOLERANCING DOES NOT APPLY TO WELDS.
 - ITEM 7 IS TO BE FIELD CUT FOR FITUP. THE MAXIMUM PERMISSIBLE GAP BETWEEN THE BOTTOM OF ITEM 7 AND THE TOP OF THE RING GIRDER FLANGE IS DETERMINED AS FOLLOWS. WHERE THE DISTANCE FROM THE CENTERLINE OF THE BOTTOM PIN TO THE TOP OF RING GIRDER FLANGE IS 3.25 INCHES OR GREATER, THE MAXIMUM PERMISSIBLE GAP IS 1.50 INCHES. WHERE PIN-TO-FLANGE DIMENSION IS LESS THAN 3.25 INCHES, THE MAXIMUM PERMISSIBLE GAP IS DETERMINED BY SUBTRACTIVE 1.75 INCHES FROM THE PIN-TO-FLANGE DIMENSION.
- NOTES CONTINUED ON SHEET 3

| QTY | AR | DESCRIPTION | ASME SA SIG | GR. TO | QTY |
|-----|----|---|-------------|--------|-----|
| 1 | | REINFORCING PAD 1.00 THK STK | ASME SA SIG | GR.70 | 11 |
| 1 | | VENT HEADER SUPPORT COLUMN ASSEMBLY - MOD | | | 602 |
| 1 | | GUSSET PLATE .625 THK STK | ASME SA 516 | GR.70 | 10 |
| 1 | | THE PLATE .28 THK STK | ASME SA 516 | GR.70 | 9 |
| 1 | | GUSSET PLATE .625 THK STK | ASME SA 516 | GR.70 | 8 |
| 1 | | RING GIRDER TONGUE PLATE 1.00 THK STK | ASME SA 516 | GR.70 | 7 |
| 2 | | PLATE .25 THK STK | ASME SA 36 | | 6 |
| 1 | | BAR, 2.50 DIA STK | ASME SA 36 | | 5 |
| 1 | | PLATE .75 THK STK | ASME SA 516 | GR.70 | 4 |
| 2 | | PLATE .625 THK STK | ASME SA 516 | GR.70 | 3 |
| 1 | | PLATE 1.00 THK STK | ASME SA 516 | GR.70 | 2 |
| 1 | | BAR, 3.00 DIA STK | ASME SA 36 | | 1 |
| 2 | | CLEVIS PIN WELDMENT | | | 604 |
| 1 | | RING COLLAR ATTACHMENT WELDMENT | | | 603 |
| 1 | | COLUMN WELDMENT | | | 601 |
| 1 | | VENT HEADER SUPPORT COLUMN ASSEMBLY - MOD | | | 601 |

QUANTITIES LISTED FOR 601 & 602 ARE REQUIRED TO MAKE A SINGLE SUPPORT COLUMN ASSEMBLY. FOUR SUPPORT COLUMN ASSEMBLIES ARE REQUIRED AT EACH OF THE TEN NON-VENT BAYS FOR A TOTAL OF 40 ASSEMBLIES. TWO 603 AND TWO 604 ASSEMBLIES ARE REQUIRED AT BAYS 8 & 14 AND FOUR 601 ASSEMBLIES AT ALL OTHER NON-VENT BAYS. SEE PLAN VIEW OF TORUS ON SHEET 2 FOR LOCATION OF 603 ASSEMBLIES.

UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES.

TOLERANCES: 3 PLACE 3 PLACE ANGLES 10 10 10

DO NOT SCALE.

DATE: 10/11/83

SCALE: AS NOTED

MPR ASSOCIATES, INC.
140 CONNECTICUT AVE, SUITE 2000
WASHINGTON, D.C. 20004

PROJECT: OYSTER CREEK GENERATING STATION
TITLE: VENT HEADER REPLACEMENT SUPPORT COLUMN FABRICATION AND INSTALLATION

DATE: 10/11/83
SCALE: AS NOTED

1083-00-07