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September 11, 2006

VIA FEDEX

Sara E. Brock
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Request Under 10 CFR §§ 2.390 to Withhold Materials from Public Disclosure

Dear Ms. Brock:

As we discussed during our recent telephone conversations, FirstEnergy Nuclear Operating Company (FENOC) has reviewed the five boxes of documents found at Davis-Besse in June 2006 to determine which documents may contain proprietary information. Attached to this letter is a matrix which shows the proprietary document file name (corresponding to the two CDs hand delivered to your representative on September 2, 2006), the pages that contain the proprietary information, the owner of that information, and a brief description. FENOC requests that the documents be withheld from public disclosure under 10 CFR §§ 2.390(a)(4) because they contain trade secrets, commercial, or financial information.

As we discussed, the documents on the two CDs produced on September 2, 2006, do not contain the documents produced to you on July 11, 2006. Those documents were removed from the five boxes because they were potentially responsive to prior NRC subpoenas, converted to pdf files, and produced to you on a CD that contained two folders — one containing 62 non-proprietary documents, the other containing 11 proprietary documents. In sum, the documents in the July 11 production and those in the September 2 production constitute the entire population of the five boxes of newly discovered documents.

Sara E. Brock
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Please feel free to call me if you have any questions or would like to discuss these matters further.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald P. Ferraro". The signature is written in a cursive style with a large, prominent initial "D".

Donald P. Ferraro

Attachment

cc: D. Jenkins

Proprietary Documents in Five Boxes of “R. Cook” Documents Discovered at Davis-Besse in June 2006 for which FENOC Requests Withholding from Public Disclosure Under 10 CFR § 2.390(a)(4)

No.	File Name	Page(s) ¹	Owner	Description
Box 1				
1.	00094.pdf	286	Framatome	Process Traveler – ID Temper Bead Repair
2.	00526.pdf	2-3	INPO	OE 13398, “Control Rod Drive Mechanism Nozzle Circumferential Flaws and Material Void at Davis-Besse”
3.	00526.pdf	8	Framatome	Service Structure Map – CRDM/Core Locations
4.	00926.pdf	8-38	Framatome	Serial 2761, “Reactor Pressure Vessel Head Penetration Examination Plans for the Davis-Besse Nuclear Power Station,” Attachment 2, “Framatome UT Inspection Approach”
5.	01952.pdf	2-5	EPRI	“Key Plant Parameters for PWR Reactor Vessel Head Nozzle PWSCC Assessments (July 2001)”
6.	01961.pdf	All	Framatome	Engineering Information Record No. 5013435-02, “CRDM Nozzle/Bore Dimensional Analysis”
Box 2				
7.	02612.pdf	158-165	EPRI	“Key Plant Parameters for PWR Reactor Vessel Head Nozzle PWSCC Assessments (July 2001)”
8.	02612.pdf	335-348	Framatome	Engineering Information Record No. 5013435-02, “CRDM Nozzle/Bore Dimensional Analysis”

¹ Page numbers correspond to the total pdf pages in the file, not the numbers on each page of the document.

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No.	File Name	Page(s) ¹	Owner	Description
9.	04229.pdf	All	EPRI	Draft MRP-55, "Materials Reliability Program (MRP) Recommended Crack Growth Rates for Evaluating Primary Water Stress Corrosion Cracking (PWSCC) of Alloy 600 CRDM Nozzle Material"
Box 3				
10.	05620.pdf	29-31	EPRI	Three pages from EPRI "Handbook of Nuclear Materials," dated December 1997
11.	06585.pdf	All	Framatome	<ul style="list-style-type: none"> • Welding Procedure Specification WP8/8/F5AW2-03 • Procedure Qualification Record PQ4364-00 • Procedure Qualification Record PQ4379-00 • Procedure Qualification Record PQ7037-02 • Procedure Qualification Record PQ7038-03 • Procedure Qualification Record PQ7114-02
12.	06616.pdf	All	Framatome	<ul style="list-style-type: none"> • Welding Procedure Specification WP43/43/F43AW3-04 • Procedure Qualification Record PQ7060-01 • Procedure Qualification Record PQ5394-01
13.	06633.pdf	All	Framatome	<ul style="list-style-type: none"> • Welding Procedure Specification WP3/43/F43TBSCa3-00 • Procedure Qualification Record PQ7164-02 • Procedure Qualification Record PQ7183-01

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No.	File Name	Page(s) ¹	Owner	Description
14.	06652.pdf	All	Framatome	<ul style="list-style-type: none"> • Welding Procedure Specification WP3/F5CLTB2-00 • Procedure Supplement 55-PS0037-01 • Procedure Qualification Record PQ7075-01
15.	06669.pdf	All	Framatome	<ul style="list-style-type: none"> • Engineering Information Record 51-5017815-00, "Davis-Besse RVCH Erosion Mockup Requirements @CRDM Penetration #3" • Nozzle #3 Penetration Process Traveler, "Demonstration Mockup, Part A, RVCH Repair"
16.	06707.pdf	All	Framatome	Framatome ANP Nondestructive Examination Procedure, "Ultrasonic Examination of Temper Bead Weld Repairs"
17.	06723.pdf	All	Framatome	Framatome ANP Nondestructive Examination Procedure, "Visible Solvent Removable Liquid Penetrant Examination Procedure"
18.	06735.pdf	All	SPEC American Technical Services	Nondestructive Examination Procedure, "Radiographic Testing"
19.	06778.pdf	All	Framatome	Drawing, "Demonstration Mockup RVH Repair"
20.	06779.pdf	All	Framatome	<ul style="list-style-type: none"> • Special Process Procedure – 5 (SPP-5), "Temper Bead Weld Repair" • Procedure Supplement 55-PS0035-00

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No.	File Name	Page(s) ¹	Owner	Description
21.	06797.pdf	All	Framatome	<ul style="list-style-type: none"> • Welding Procedure Specification WP3/8/F5HT2-00 • Procedure Supplement 55-PS0036-00 • Procedure Qualification Record 55-PQ3840-00
22.	06827.pdf	All	INPO	SER 11-94, Supplement 1, "Feedflow Input Error to Secondary Calorimetric Results in Reactor Operation Above Thermal Power Limit"
23.	06972.pdf	All	INPO	OE11658, "RCS Instrument Valve Stem Failure" (page 1)
24.	06973.pdf	All	INPO	OE11658, "RCS Instrument Valve Stem Failure" (page 2)
25.	06974.pdf	All	INPO	OE11658, "RCS Instrument Valve Stem Failure" (page 3)
26.	06975.pdf	All	INPO	OE11658, "RCS Instrument Valve Stem Failure" (page 4)
27.	06985.pdf	All	EPRI	One page from EPRI "Handbook of Nuclear Materials," dated December 1997
28.	06986.pdf	All	EPRI	One page from EPRI "Handbook of Nuclear Materials," dated December 1997
29.	06987.pdf	All	EPRI	One page from EPRI "Handbook of Nuclear Materials," dated December 1997
30.	06991.pdf	All	INPO	OE2422, "Improper Heat Treatment of Valve Stem"
31.	07001.pdf	All	INPO	OE9094, "RCS Bypass Loop Valve Failure" (page 1)
32.	07002.pdf	All	INPO	OE9094, "RCS Bypass Loop Valve Failure" (page 2)
33.	07003.pdf	All	INPO	OE7290, "Stem-disc Separation of Manual Valves" (page 1)

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No.	File Name	Page(s) ¹	Owner	Description
34.	07004.pdf	All	INPO	OE7290, “Stem-disc Separation of Manual Valves” (page 2)
35.	07005.pdf	All	INPO	OE7290, “Stem-disc Separation of Manual Valves” (page 3)
36.	07006.pdf	All	INPO	OE7290, “Stem-disc Separation of Manual Valves” (page 4)
37.	07007.pdf	All	INPO	OE7290, “Stem-disc Separation of Manual Valves” (page 5)
38.	07008.pdf	All	INPO	OE7290, “Stem-disc Separation of Manual Valves” (page 6)
39.	07009.pdf	All	INPO	OE7290, “Stem-disc Separation of Manual Valves” (page 7)
40.	07010.pdf	All	INPO	OE7290, “Stem-disc Separation of Manual Valves” (page 8)
41.	07011.pdf	All	INPO	OE7290, “Stem-disc Separation of Manual Valves” (page 9)
42.	07795.pdf	4-26	Framatome	SIA Calculation Package, “Operability and Root Cause Evaluation of the Damage of the Reactor Pressure Vessel Head Wastage Cavity”
43.	07897.pdf	24-87	Framatome	Draft Calculation Package, “Stress Profile and K-Solution dor DB Monte Carlo Analysis” (8 copies of 8-page calculation)
44.	07984.pdf	All	Framatome	Engineering Information Record No. 51-5015818-00, “Davis-Besse CRDM Nozzle Heat Information” (first 2 pages of 4-page document)
45.	07986.pdf	1-30	Framatome	Engineering Information Record No. 51-5015818-00, “Davis-Besse CRDM Nozzle Heat Information” (last 2 pages of 4-page document, 7 copies of 4-page document)

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No.	File Name	Page(s) ¹	Owner	Description
46.	08075.pdf	14-49	Framatome	Calculation Summary Sheet No. 32-5015453-00, "DB CRDM Nozzle IDTB Weld Anomaly Flaw Evaluations"
		51-59	Framatome	Calculation Summary Sheet No. 32-5015453-01, "DB CRDM Nozzle IDTB Weld Anomaly Flaw Evaluations" (9 pages of 36-page document)
Box 4				
47.	08451.pdf	9-46	Framatome	In proprietary version of Serial 2743, SIA Calculation Package W-ENTP-11Q-306, "Davis-Besse Technical Response to NRC Bulletin 2001-01"
48.	08919.pdf	4-5	Framatome	"Davis-Besse Repair Plan for Nozzle 2"
49.	08984.pdf	24	Framatome	"DB-1 reactor Vessel Head Lifting Pressure Calculation (Preliminary)"
50.	09176.pdf	27	Framatome	Engineering Input to No. 3 Repair Plan
51.	09382.pdf	1	EPRI	Plant PWSCC Ranking and Supporting Information
		28-32	Framatome	SIA Calculation Package W-ENTP-11Q-314, "Davis-Besse Technical Response to NRC Bulletin 2001-01"
52.	10922.pdf	41-71	Framatome	SIA Calculation Package W-DB-01Q-301, "Operability and Root Cause Evaluation of the Damage of the Reactor Pressure Vessel Head at Davis-Besse"
53.	11248.pdf	2-5	EPRI	Attachment to July 31, 2001 letter from A. Marion, NEI, to B. Sheron, NRC: "Key Plant Parameters for PWR Reactor Vessel Head Nozzle PWSCC Assessments (July 2001)"
54.	11415.pdf	All	Framatome	Engineering Information Record 51-5015818-00, "Davis-Besse CRDM Nozzle Heat Information"

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No.	File Name	Page(s) ¹	Owner	Description
55.	11419.pdf	All	Framatome	Engineering Information Record 51-5015816-00, “Stress Profile and K-Solution for DB Monte Carlo Analysis”
56.	11427.pdf	6-72	Framatome	Report BAW-2409P, “CRDM Nozzle ID Temper Bead Weld Repair Process Qualification”
		78-79	INPO	Event Description No. 38435, “Discovery of Apparent Through-Wall Indications on Control Rod Drive Mechanism Penetrations”
57.	11514.pdf	All	INPO	Event Descriptions
Box 5				
None				