



FirstEnergy Nuclear Operating Company

WITHHOLD IN ACCORDANCE WITH 10 CFR 2.390(a)(4)
WHEN SEPARATED FROM ENCLOSURE C,
HANDLE THIS DOCUMENT AS DECONTROLLED

5501 North State Route 2
Oak Harbor, Ohio 43449

Brian D. Boles
Vice President, Nuclear

419-321-7676

June 8, 2017
L-17-190

10 CFR 50

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License Number NPF-3
Response to Request for Information Regarding License Renewal Commitment No. 54

By letter dated January 23, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17026A004), as supplemented by letter dated March 23, 2017 (ADAMS Accession No. ML17086A019), the FirstEnergy Nuclear Operating Company (FENOC) submitted an evaluation by AREVA in response to Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS), License Renewal Commitment No. 54. By electronic mail dated May 9, 2017 (ADAMS Accession No. ML17129A411), the U.S. Nuclear Regulatory Commission (NRC) staff determined that additional information was required to complete its review of the submittals.

The Enclosures listed below provide the FENOC response to the Request for Additional Information on Time-Limited Aging Analysis for the DBNPS Reactor Vessel Internals:

- A. AREVA Affidavit to Support the Disclosure Request for the Proprietary AREVA Report AREVA Report ANP-3542Q1P Revision 0, "Response to NRC Request for Additional Information on Time-Limited Aging Analysis for the DB-1 Reactor Vessel Internals"
- B. AREVA Report ANP-3542Q1NP Revision 0, "Response to NRC Request for Additional Information on Time-Limited Aging Analysis for the DB-1 Reactor Vessel Internals" (Non-Proprietary)
- C. AREVA Report ANP-3542Q1P Revision 0, "Response to NRC Request for Additional Information on Time-Limited Aging Analysis for the DB-1 Reactor Vessel Internals" (Proprietary)

AREVA Report ANP-3542Q1P Revision 0 (Enclosure C) documents DBNPS reactor vessel internals Time-Limited Aging Analysis details that are considered proprietary information that is to be withheld from public disclosure pursuant to 10 CFR 2.390. A non-proprietary version of the document is provided as Enclosure B. Upon removal of Enclosure C, this letter can be decontrolled.

A145
NRR

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Patrick J. McCloskey, Manager – Regulatory Compliance, at (419) 321-7274.

Sincerely,



Brian D. Boles

Enclosures:

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cc: w/o Enclosures
NRC Region III Administrator
NRR Project Manager
NRC Resident Inspector
Utility Radiological Safety Board

Enclosure A

Letter L-17-190

Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS)

AREVA Affidavit
to Support the Disclosure Request for the
Proprietary AREVA Report AREVA Report ANP-3542Q1P Revision 0,
"Response to NRC Request for Additional Information on Time-Limited
Aging Analysis for the DB-1 Reactor Vessel Internals"

3 pages follow

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

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

- (a) The information reveals details of AREVA'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 AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(a), 6(c) and 6(d) above.

7. In accordance with AREVA'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 AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA 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.

Tom Ryan

SUBSCRIBED before me this 31st
day of May, 2017.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

