



May 2, 1995

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

Subject: Braidwood Station Units 1 and 2  
Byron Station Units 1 and 2  
Dresden Station Units 2, and 3  
LaSalle County Station Units 1 and 2  
Quad Cities Station Units 1 and 2  
Zion Station Units 1 and 2

Supplemental Commonwealth Edison Submittal of Information  
Pertaining to Motor Operated Valve Testing as Specified in NRC  
Generic Letter 89-10 and the Subsequent Supplements to the  
Generic Letter

NRC Dockets 50-456 and 50-457  
NRC Dockets 50-454 and 50-455  
NRC Dockets 50-237 and 50-249  
NRC Dockets 50-373 and 50-374  
NRC Dockets 50-254 and 50-265  
NRC Dockets 50-295 and 50-304

- References: (1) USNRC Generic Letter 89-10 (With Supplements), "Safety  
Related Motor Operated Valve Testing and Surveillance"
- (2) ComEd (M.J. Vonk) letter dated February 16, 1995 to  
Document Control Desk, "Commonwealth Edison Submittal of  
Information Pertaining to Motor Operated Valve Testing as  
Specified in NRC Generic Letter 89-10 and the Subsequent  
Supplements to the Generic Letter"

Pursuant to telephone communications between ComEd and NRR the attached  
information is being resubmitted relating to our Motor Operated Valve (MOV) Testing  
and Surveillance Program.

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ATTACHMENT CONTAINS  
PROPRIETARY INFORMATION

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PDR ADOCK: 05000237  
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May 2, 1995

All Attachments, with the exception of the accompanying affidavit (Attachment 4), to this submittal contains items which are proprietary in nature to Commonwealth Edison Company. The affidavit accompanied the original submittal, Reference (2), per the requirements of 10CFR2.790(b), and explains the reasons and circumstances for withholding the applicable information from public disclosure.

To the best of my knowledge and belief, the analyses and evaluations contained in this letter are true and correct. In some respects these documents are not based on my personal knowledge, but on information furnished by other Commonwealth Edison employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

If there are any questions concerning this matter, or need for further clarification, please contact this office.

Sincerely,



Martin J. Vonk  
Licensing Administrator

Attachments:

- Attachment 1      LTAFLA Verification and Validation Report - Predicting Fatigue Life of Limitorque Type SMB/SB/SBD Actuator Torsional Components, KALSI Document 1866C, Rev. 0  
(This Document is Considered PROPRIETARY)
- Attachment 2      LTAFLA User's Manual-Predicting Fatigue Life of Limitorque Type SMB/SB/SBD Actuator Torsional Components, KALSI Document 1863C, Rev. 0  
(This Document is Considered PROPRIETARY)
- Attachment 3      LTAFLA Mathematical and Computational Model-Predicting Fatigue Life of Limitorque Type SMB/SB/SBD Actuator Torsional Components, KALSI Document 1862C, Rev. 0  
(This Document is Considered PROPRIETARY)
- Attachment 4      John Hosmer Affidavit Certifying Proprietary Information

cc:    G. Dick, ComEd Generic Issues Project Manager - NRR

ATTACHMENT

ATTACHMENT

Commonwealth Edison Company

AFFIDAVIT

I, John Hosmer, being duly sworn, depose and state as follows:

- (1) I am Vice President of Nuclear Engineering, Commonwealth Edison Company (ComEd) and have been delegated the function of reviewing the confidential commercial information described in paragraph (3) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) Project Managers, Plant Managers, Site Vice Presidents, General Office Department Heads, and Commercial Division Process/Unit Resource Leaders are responsible for classifying (or delegating the classification) of proprietary or confidential information. These persons are most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge.
- (3) The information sought to be withheld was developed by ComEd, and/or ComEd consultants, pertaining directly to Motor Operated Valve Testing performed for or by ComEd. ComEd is the owner of such confidential commercial information and the related reports. Specifically this information includes:
  - a. LTAFLA Verification and Validation Report - Predicting Fatigue Life of Limitorque Type SMB/SB/SBD Actuator Torsional Components, KALSI Document 1866C, Rev. 0
  - b. LTAFLA User's Manual-Predicting Fatigue Life of Limitorque Type SMB/SB/SBD Actuator Torsional Components, KALSI Document 1863C, Rev. 0
  - c. LTAFLA Mathematical and Computational Model-Predicting Fatigue Life of Limitorque Type SMB/SB/SBD Actuator Torsional Components, KALSI Document 1862C, Rev. 0
  - d. ComEd MOV AC Motor Test Program Test Report Part 1, dated January 1995.
  - e. ComEd Calculation NED-E-MSD-1, Rev. 0
  - f. ComEd Calculation NED-E-MSD-2, Rev. 0

- (4) In making this application for withholding of such confidential commercial information, ComEd relies upon the exemption from disclosure set forth in the Freedom of Information Act (FOIA), 5 USC § 552(b)(4), and NRC Regulations 10 CFR §§ 9.17(a)(4), and 2.790(a)(4) for "commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The confidential commercial information should be withheld from disclosure under 10 CFR § 2.790 (b)(4) for the following reasons:
- (a) The information marked Proprietary or Confidential and is of a sort customarily held in confidence by ComEd. Access to such documents within ComEd is limited on a "need to know" basis. Disclosures outside ComEd are limited to regulatory bodies, Test Program Utility Participants (under restrictions that preclude further disclosure), their agents or licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements;
  - (b) The information has, to the best of my knowledge, consistently been held in confidence by ComEd, and not been publicly disclosed. All disclosures to third parties including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or under restrictions as described above.
  - (c) The information sought to be withheld is being submitted to the NRC in confidence; and
  - (d) The information is not available in public sources.
- (5) The information identified in paragraph (3) is a confidential compilation of Motor Operated Valve Test Information and resultant Test Reports developed to respond to the concerns expressed in NRC Generic Letter 89-10 and its subsequent supplements. The confidential commercial information includes detailed results of the testing, including conclusions developed, represent, as a whole, an integrated process or approach developed by ComEd, and applied to the Motor Operated Valve question. The development of this test data was undertaken by ComEd at considerable cost and has considerable financial value to others.

- (6) Public disclosure of the information sought to be withheld is likely to cause substantial harm to ComEd's competitive position and foreclose or reduce the availability of profit-making opportunities for such information. ComEd's competitive advantage will be lost if its competitors are able to use the results of ComEd experience to avoid fruitless avenues, or to normalize or verify their own process, or to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.
- (7) While some portion of the underlying process may, at various times, have been publicly revealed, the analyses and baseline test information have been held in confidence. This information, in its compiled form, continues to have great competitive advantage to ComEd. This value would be lost if the information as a whole, were to be disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure would unfairly provide competitors with a windfall, and deprive ComEd of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing the test process.

State of Illinois )  
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 County of DuPage )

ss:

John Hosmer, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at Downers Grove, Illinois, this 17<sup>th</sup> day of February 1995.

John Hosmer  
 John Hosmer  
 Vice President

Subscribed and sworn before me this 17<sup>th</sup> day of February 1995.

Mary Jo Yack  
 Notary Public,  
 State of Illinois

