Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

ComEd

May 24, 1995

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Station Units 2 and 3
Design Documents for the Dresden Station Core Shroud Repair
NRC Docket Nos. 50-237 and 50-249

Reference: J.L. Schrage letter to USNRC, dated March 30, 1995.

In the referenced letter, ComEd submitted the proposed inspection plan for the Dresden Station Unit 2 Core Shroud. This inspection plan was provided in response to Generic Letter 94-03, "Intergranular Stress Corrossion Cracking of the Core Shrouds in Boiling Water Reactors." This letter transmits the Design Documents for the proposed repair of the Dresden Station Unit 2 and 3 core shrouds. ComEd is presently planning to install the core shroud repair hardware into Dresden Station Unit 2 beginning on July 18, 1995 during the D2R14 refueling outage.

The Dresden Station Unit 2 and Unit 3 core shroud repair was developed in accordance with ASME Section XI repair and replacement program requirements. The design has been developed considering through-wall 360 degree circumferential cracks at the H1 through H8 welds. This modification does not remove the existing flaws, nor replace the flawed components, but rather structurally replaces the core shroud horizontal circumferential welds H1 through H7, and accounts for cracking of the H8 weld. The repair will be performed as an alternative to the ASME Section XI Code as permitted by 10 CFR 50.55a(a)(3). In accordance with requirements of the above reference, ComEd is submitting this alternative code repair for NRC review and approval.

Attachment 1 to this letter provides a detailed list of each core shroud repair design document, which are included as Enclosures 1 through 19. Please note that Enclosure 18 consists of 53 separate construction drawings of the core shroud repair hardware.

This submittal contains items which are proprietary in nature to the General Electric Nuclear Company. ComEd has specifically marked the portions of the submittal that are considered proprietary and requests that all material specifically marked as proprietary be withheld from public disclosure. ComEd has included, as Attachment 2, affidavits per the requirements of 10CFR 2.790(b) explaining the reasons and circumstances for withholding the applicable information from public disclosure.

Ltr Encl w/out Prop Encls

APO1 Change: NRC PDR 1

1/1

k:\nla\dresden\shroud\d52495.wpf

To the best of my knowledge and belief, the statements contained in this response are true and correct. In some respects, these statements are not based on my personal knowledge, but obtained information furnished by other ComEd employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Please direct any questions you may have concerning this response to this office.

John L. Schrage
Nuclear Licensing Administrator

OFFICIAL SEAL
MARY JO YACK
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES: 11/29/97

Mary Jo Yack 5-24-95

Attachment 1 List of Dresden Unit 2 and Unit 3 Core Shroud Repair Design Documents

Enclosures 1 through 19 Dresden Unit 2 and Unit 3 Core Shroud Repair Design Documents

Attachment 2 Dresden Station Unit 2 and 3 Core Shroud Repair Design Documents - General Electric Company Affidavits

cc: J. B. Martin, Regional Administrator - RIII
M. N. Leach, Senior Resident Inspector - Dresden
J. F. Stang, Project Manager - NRR
Office of Nuclear Facility Safety - IDNS

k:\nla\dresden\shroud\d52495.wpf

Attachment 1

The Dresden Station Unit 2 and Unit 3 core shroud repair Design Documents are provided in the following Enclosures:

Enclosure 1. GENE Design Specification, 25A5688, Revision 2, "Dresden 2 and 3 - Shroud Stabilizer Hardware".

Enclosure 2. GENE Code Design Specification, 25A5689, Revision 1, "Dresden 2 and 3 - Reactor Pressure Vessel".

Enclosure 3. GENE Fabrication Specification, 25A5690, Revision 2, "Dresden 2 and 3 - Fabrication of Shroud Stabilizer".

Enclosure 4. GENE Installation Specification, 25A5698, Revision 1, "Dresden 2 and 3 - Shroud Stabilizer Installation".

Enclosure 5. GENE 771-81-1194, Revision 1, "Commonwealth Edison Company Dresden Nuclear Power Plant Units 2 & 3, Shroud and Shroud Repair Hardware Analysis, Volume I, Shroud Repair Hardware".

Enclosure 6. GENE 771-81-1194, Revision 1, "Commonwealth Edison Company Dresden Nuclear Power Plant Units 2 & 3, Shroud and Shroud Repair Hardware Analysis, Volume II, Shroud".

Enclosure 7. GENE-771-82-1194, Revision 1, Backup Calculations for Dresden Shroud Repair Shroud Stress Report for Commonwealth Edison Dresden Nuclear Power Station, Units 2 and 3

Enclosure 8. GENE-771-83-1194, Revision 1, "Commonwealth Edison Company Dresden Nuclear Power Plant Units 2 & 3, Shroud and Shroud Repair Hardware Analysis, Shroud Repair Hardware Backup Calculation". (Proprietary information)

Enclosure 9. GENE-771-84-1194, Revision 2, "Dresden Units 2 & 3, Shroud Repair Seismic Analysis". (Proprietary information)

Enclosure 10. GENE 771-85-1194, Revision 2, "Dresden Units 2 & 3, Shroud Repair Seismic Analysis Backup Calculations". (Proprietary information)

Enclosure 11. GENE Stress Report, 25A5691, Revision 2, "Pressure Vessel - Dresden Units 2 & 3".

Enclosure 12. GENE 771-77-1194, Revision 2, "Shroud Repairs Program for Dresden Units 2 & 3 - Back-up Calculations for RPV Stress Report No: 25A5691". (Proprietary information)

Enclosure 13. GENE-771-95-0195, Revision 1, "Dresden Units 2 & 3 - Top Ring Plate and Star Truss Stress Analysis".

Enclosure 14. GENE-771-96-0195, Revision 1, "Dresden Units 2 & 3, Top Ring Plate and Star Truss Analysis Backup Calculations". (Proprietary information)

Enclosure 15. GENE-523-A181-1294, Revision 0, Commonwealth Edison Company Dresden Units 2 & 3 Nuclear Power Station, - Primary Structure Seismic Models.

Enclosure 16. GENE Letter, M. D. Potter - GE Shroud Project Engineer to Kenneth Hutko - ComEd Shroud Project Engineer, Subject - Performance impact of shroud repair leakage for Dresden Units 2 & 3, dated May 18, 1995 (B13-01749, MDP-9536)

Enclosure 17. 10CFR50.59 Safety Evaluation for Dresden Units 2 and 3 Core Shroud Repair

Enclosure 18. Construction drawings

a. Reactor Modification/Installation Drawing 107E5719, Revision 5, Sheet 1 of 3, Reactor Assembly
b. Reactor Modification/Installation Drawing 107E5719, Revision 5, Sheet 2 of 3, Reactor Assembly
c. Reactor Modification/Installation Drawing 107E5719, Revision 5, Sheet 3 of 3, Reactor Assembly
d. Assembly Drawing 112D6636, Revision 1, Sheet 1 of 1, Bracket Yoke Assembly
e. Detail Drawing 112D6637, Revision 0, Sheet 1 of 1, Lock, Bolt
f. Assembly Drawing 112D6638, Revision 0, Sheet 1 of 1, Lower Stabilizer Assembly
g. Assembly Drawing 112D6639, Revision 0, Sheet 1 of 1, Toggle Bolt Assembly

Attachment 1 (cont.)

h. Assembly Drawing 112D6640, Revision 0, Sheet 1 of 1, Tie Rod Assembly
i. Assembly Drawing 112D6641, Revision 1, Sheet 1 of 1, Stabilizer Support Assembly
j. Assembly Drawing112D6642, Revision 1, Sheet 1 of 1, Upper Stabilizer Assembly
k. Detail Drawing112D6643, Revision 1, Sheet 1 of 1, Latch
l. Detail Drawing112D6644, Revision 0, Sheet 1 of 1, Screw, Mid Support
m. Detail Drawing112D6645, Revision 0, Sheet 1 of 1, Ring, Mid support
n. Detail Drawing112D6646, Revision 0, Sheet 1 of 1, Washer, Jack Bolt
o. Detail Drawing112D6647, Revision 0, Sheet 1 of 1, Sleeve, Jack Bolt
p. Detail Drawing112D6648, Revision 0, Sheet 1 of 1, Retainer
q. Detail Drawing112D6649, Revision 0, Sheet 1 of 1, Nut, Top Support
r. Detail Drawing112D6650, Revision 0, Sheet 1 of 1, Bolt, Top Support
s. Detail Drawing112D6651, Revision 1, Sheet 1 of 1, Pin
t. Detail Drawing112D6652, Revision 1, Sheet 1 of 1, Nut, Tie Rod
u. Detail Drawing112D6653, Revision 0, Sheet 1 of 1, Pin, Clevis
v. Detail Drawing112D6655, Revision 1, Sheet 1 of 1, Extension, Lower Spring
w. Detail Drawing112D6656, Revision 0, Sheet 1 of 1, Screw, Yoke
x. Detail Drawing112D6657, Revision 0, Sheet 1 of 1, Bracket, Upper Spring
y. Detail Drawing112D6658, Revision 0, Sheet 1 of 1, Clip, Retainer
z. Detail Drawing112D6659, Revision 0, Sheet 1 of 1, Bolt, Jack
aa. Detail Drawing112D6660, Revision 0, Sheet 1 of 1, Nut,Toggle Bolt
ab. Detail Drawing112D6661, Revision 0, Sheet 1 of 1, Washer,Toggle Bolt
ac. Detail Drawing112D6662, Revision 0, Sheet 1 of 1, Pin, Toggle Bolt
ad. Detail Drawing112D6663, Revision 0, Sheet 1 of 1, Toggle
ae. Detail Drawing112D6664, Revision 0, Sheet 1 of 1, Support, Lower
af. Detail Drawing112D6665, Revision 0, Sheet 1 of 1, Bolt, Toggle
ag. Detail Drawing112D6666, Revision 0, Sheet 1 of 1, Contact, Upper
ah. Detail Drawing112D6667, Revision 0, Sheet 1 of 1, Contact, Lower
ai. Detail Drawing112D6668, Revision 2, Sheet 1 of 1, Support
aj. Detail Drawing112D6669, Revision 1, Sheet 1 of 1, Upper Support, Long
ak. Detail Drawing112D6670, Revision 2, Sheet 1 of 1, Spring, Upper
al. Detail Drawing112D6671, Revision 2, Sheet 1 of 1, Spring, Lower
am. Detail Drawing112D6672, Revision 1, Sheet 1 of 1, Rod, Tie
an. Assembly Drawing112D6673, Revision 0, Sheet 1 of 1, Tie Rod-Spring Assembly
ao. Detail Drawing112D6674, Revision 0, Sheet 1 of 1, Spring, Retainer
ap. Detail Drawing112D6675, Revision 0, Sheet 1 of 1, Bracket Yoke
aq. Detail Drawing112D6676, Revision 2, Sheet 1 of 1, Upper Support Short
ar. Detail Drawing112D6677, Revision 0, Sheet 1 of 1, Nut, Lock
as. Detail Drawing112D6678, Revision 0, Sheet 1 of 1, Bolt, Torsion Arm
at .Detail Drawing112D6679, Revision 0, Sheet 1 of 2, Arm, Torsion
au. Detail Drawing112D6679, Revision 0, Sheet 2 of 2, Arm, Torsion
av. Assembly Drawing112D6680, Revision 1, Sheet 1 of 1, Mid Support Assembly
aw. Detail Drawing112D6681, Revision 2, Sheet 1 of 1, Support, Mid-Shroud
ax. Assembly Drawing112D6734, Revision 1, Sheet 1 of 1, Core Plate Wedge Assy
ay. Detail Drawing112D6735, Revision 1, Sheet 1 of 1, Wedge, Core Plate
az. Detail Drawing 112D6736, Revision 1, Sheet 1 of 1, Clip, Core Plate
ba. Detail Drawing 112D6737, Revision 1, Sheet 1 of 1, Bolt, Wedge

Enclosure 19. One color picture of a computer model of the core shroud repair installed at Quad Cities.

Attachment 2

General Electric Nuclear Company Affidavits

General Electric Company Affidavit of proprietary information (DJR-QCAF5951.DOC), By D. J. Robare Dated May 19, 1995

General Electric Company Affidavit of proprietary information (DJR-QCAF5951.DOC), By B. G. Stramback Dated May 23, 1995

General Electric Company

AFFIDAVIT

I, David J. Robare, being duly sworn, depose and state as follows:

(1) I am Project Manager, Plant Licensing/Renewal Projects, General Electric Company ("GE") 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 following GE proprietary reports:

GENE-771-77-1194, Rev. 2, Back-Up Calculation for RPV Stress Report No. 25A5691, Dresden Units 2 &3.
GENE-771-82-1194, Rev. 1, Backup Calculations for Dresden Shroud Repair, Shroud Stress Report, Vol. II, Dresden Units 2 & 3.
GENE-771-83-1194, Rev. 1, Shroud and Shroud Repair Hardware Analysis, Shroud Repair Hardware Backup Calculations, Dresden Units 2 & 3.
GENE-771-84-1194, Rev. 2, Shroud Repair Seismic Analysis, Dresden Units 2 & 3.
GENE-771-85-1194, Rev. 2, Shroud Repair Seismic Analysis Backup Calculations, Dresden Units 2 & 3.
GENE-771-96-0195, Rev. 1, Top Ring Plate and Star Truss Stress Analysis Backup Calculations, Dresden Units 2 & 3.
GENE-523-A181-1294, Rev. 1, Dresden Units 2 & 3, Primary Structure Seismic Models, Dec. 1994.

The proprietary information is delineated by bars marked in the margin adjacent to the specific material.

(3) In making this application for withholding of proprietary information of which it is the owner, GE relies upon the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), 2.790(a)(4), and 2.790(d)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The 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 General Electric's competitors without license from General Electric 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 General Electric, its customers, or its suppliers;

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

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 both paragraphs (4)a. and (4)b., above.

(5) The information sought to be withheld is being submitted to NRC in confidence. The information is of a sort customarily held in confidence by GE, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GE, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.

(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. Access to such documents within GE is limited on a "need to know" basis.

(7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist or other equivalent authority, by the manager of the cognizant marketing function (or his delegate), and by the Legal Operation, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside GE are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.

(8) The information identified in paragraph (2), above, is classified as proprietary because it contains detailed results of analytical models, methods and processes, including computer codes, and it contains the supporting Design Record File (DRF) detailed calculations, results and bases for conclusions. These reports are part of the DRF supporting information to evaluate a hardware design modification (stabilizer for the shroud horizontal welds) intended to be installed in a reactor to resolve the reactor pressure vessel core shroud weld cracking concern. This detailed level of information usually resides in GENE files, only for audit by customers and the NRC. This information shows in specific detail the processes, codes and methods employed to perform the evaluations summarized in the above identified document. The development and approval of this design modification utilized systems, components, and models and computer codes that were developed at a significant cost to GE, on the order of several hundred thousand dollars.

Development of the supporting processes, as shown in part in this DRF detailed information, was at a significant additional cost to GE, in excess of a million dollars, over and above the large cost of developing the underlying individual proprietary report information.

(9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to GE's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of GE's comprehensive BWR safety and technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology and includes development of the expertise to determine and apply the appropriate evaluation process. In addition, the technology base includes the value derived from providing analyses done with NRC-approved methods.

The research, development, engineering, analytical and NRC review costs comprise a substantial investment of time and money by GE.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

GE's competitive advantage will be lost if its competitors are able to use the results of the GE 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 GE 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 GE of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing these very valuable analytical tools.

STATE OF CALIFORNIA)
) ss:
COUNTY OF SANTA CLARA)

David J. Robare, 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 San Jose, California, this 19TH day of MAY 1995 ~~1993~~

David J. Robare
General Electric Company

Subscribed and sworn before me this 19th day of May 1995.

MARY L. KENDALL
COMM. # 987864
Notary Public — California
SANTA CLARA COUNTY
My Comm. Expires MAR 26, 1997

Notary Public, State of California

General Electric Company

AFFIDAVIT

I, George B. Stramback, being duly sworn, depose and state as follows:

(1) I am Project Manager, Licensing Services, General Electric Company ("GE") 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 GE proprietary drawings 107E5719, Rev. 5, *Reactor Modification/Installation Drawing*, and those drawings listed in the attachment. These documents, taken as a whole, constitutes a proprietary compilation of information, some of it also independently proprietary, prepared by General Electric Company. The independently proprietary elements that are drawings are marked as proprietary information.

(3) In making this application for withholding of proprietary information of which it is the owner, GE relies upon the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), 2.790(a)(4), and 2.790(d)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The 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 General Electric's competitors without license from General Electric 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 General Electric, its customers, or its suppliers;

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

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 both paragraphs (4)a., (4)b. and (4)e., above.

(5) The information sought to be withheld is being submitted to NRC in confidence. The information is of a sort customarily held in confidence by GE, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GE, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.

(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. Access to such documents within GE is limited on a "need to know" basis.

(7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist or other equivalent authority, by the manager of the cognizant marketing function (or his delegate), and by the Legal Operation, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside GE are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.

(8) The information identified in paragraph (2), above, is classified as proprietary because it constitutes a confidential compilation of information, including detailed design drawing results of a hardware design modification (stabilizer for the shroud horizontal welds) intended to be installed in a reactor to resolve the reactor pressure vessel core shroud weld cracking concern. The development and approval of this

design modification utilized systems, components, and models and computer codes that were developed at a significant cost to GE, on the order of several hundred thousand dollars.

The detailed results of the analytical models, methods, and processes, including computer codes, and conclusions from these applications, represent, as a whole, an integrated process or approach which GE has developed, and applied to this design modification. The development of the supporting processes was at a significant additional cost to GE, in excess of a million dollars, over and above the large cost of developing the underlying individual proprietary report and drawings information.

(9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to GE's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of GE's comprehensive BWR safety and technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology and includes development of the expertise to determine and apply the appropriate evaluation process. In addition, the technology base includes the value derived from providing analyses done with NRC-approved methods.

The research, development, engineering, analytical and NRC review costs comprise a substantial investment of time and money by GE.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

GE's competitive advantage will be lost if its competitors are able to use the results of the GE 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 GE 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 GE of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing these very valuable analytical tools.

STATE OF CALIFORNIA)
) ss:
COUNTY OF SANTA CLARA)

George B. Stramback, 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 San Jose, California, this 23rd day of May 1995.

George B. Stramback
General Electric Company

Subscribed and sworn before me this 23rd day of May 1995.

Paula F. Hussey
Notary Public, State of California

PAULA F. HUSSEY
COMM. #1046120
Notary Public — California
SANTA CLARA COUNTY
My Comm. Expires DEC 1,1998

ATTACHMENT

Drawing

112D5636, Revision 1, Bracket Yoke Assembly
112D6637, Revision 0, Lock, Bolt
112D6638, Revision 0, Lower Stabilizer Assembly
112D6639, Revision 0, Toggle Bolt Assembly
112D6640, Revision 0, Tie Rod Assembly
112D6641, Revision 1, Stabilizer Support Assembly
112D6642, Revision 1, Upper Stabilizer Assembly
112D6644, Revision 0, Screw, Mid Support
112D6645, Revision 0, Ring, Mid Support
112D6646, Revision 0, Washer, Jack Bolt
112D6647, Revision 0, Sleeve, Jack Bolt
112D6648, Revision 0, Retainer
112D6649, Revision 0, Nut, Top Support
112D6650, Revision 0, Bolt, Top Support
112D6651, Revision 1, Pin
112D5652, Revision 1, Nut, Tie Rod
112D5653, Revision 0, Pin, Clevis
112D6655, Revision 1, Extension, Lower Spring
112D6656, Revision 0, Screw, Yoke
112D6657, Revision 0, Bracket, Upper Spring
112D6658, Revision 0, Clip, Retainer
112D6659, Revision 0, Bolt, Jack
112D6660, Revision 0, Nut, Toggle Bolt
112D6661, Revision 0, Washer, Toggle Bolt
112D6662, Revision 0, Pin, Toggle Bolt
112D6663, Revision 0, Toggle
112D6664, Revision 0, Support, Lower
112D6665, Revision 0, Bolt, Toggle
112D6666, Revision 0, Contact, Upper
112D6667, Revision 0, Contact, Lower
112D6668, Revision 2, Support
112D6669, Revision 1, Upper Support Long
112D5670, Revision 2, Spring, Upper
112D5671, Revision 2, Spring, Lower
112D6672, Revision 1, Rod, Tie
112D6673, Revision 0, Tie Rod Spring Assembly
112D6674, Revision 0, Spring, Retainer
112D6675, Revision 0, Bracket Yoke
112D6676, Revision 2, Upper Support, Short
112D6677, Revision 0, Nut, Lock
112D6678, Revision 0, Bolt, Tension Arm

ATTACHMENT (cont'd)

Drawing

112D6679, Revision 0, Arm, Torsion
112D6680, Revision 1, Mid Support Assembly
112D6681, Revision 2, Support, Mid Shroud
112D6734, Revision 1, Core Plate Wedge Assembly
112D6735, Revision 1, Wedge, Core Plate
112D6736, Revision 1, Clip, Core Plate
112D6737, Revision 1, Bolt, Wedge