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## Babcock & Wilcox

a McDermott company

**Nuclear Power Generation Division** 

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January 13, 1981

Mr. James R. Miller, Chief Special Projects Branch Division of Project Management Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Miller:

Enclosed are 60 copies of BAW 10084P - Rev. 3 submitted for your review and approval. Revision 2 was approved for issue by NRC letter of May 1978 and Revision 1 was approved for issue by NRC letter dated June 6, 1977.

Three changes have been incorporated in Revision 3 of BAW 10084P. These are:

- 1. The revision of the constants in the irradiation creep equations.
- 2. Incorporation of axial gap effects in the creep collapse model.
- Resulting from the revision to irradiated creep constants, corresponding changes in the anisotropy constants.

Babcock & Wilcox requests that BAW-10084P, Rev. 3 be treated as proprietary in nature because we have independently conducted research and development to obtain the materials data and develop the innovative systems models that are included therein. These data and models are not available in the open literature and their disclosure would provide knowledgeable individuals with Babcock & Wilcox Mr. James R. Miller Page 2 - January 13, 1981

> information which is vital to reactor core materials evaluation techniques and would impair B&W's competitive position in this area. This information has been held as confidential within the Company and has not been disclosed to any other person or persons except on a proprietary basis.

By letter dated June 29, 1977, B&W submitted an amended affidavit containing supporting information for our request to treat Revision 1 of BAW-10084P as proprietary, and by letter dated September 15, 1977, NRC approved that request to withhold that report from public disclosure. Revision 2 .ransmittal letter of March 22, 1978 indicated that it contained the identical proprietary information as Rev. 1 with the exception of Figure 2-2a which was identified as an additional proprietary item. It was concluded in a letter of December 11, 1978 that another affidavit to support the proprietary classification of Rev. 2 of BAW 10084P-A was not necessary.

The revised irradiation creep constants in the creep equations and the corresponding changes made in the anisotropy constants are the only additions to the proprietary information supplied in Rev. 2. Since only revised proprietary material has been added in Revision 3 of BAW 10084P, it is concluded that another affidavit to support the proprietary classification of Revision 3 is not necessary.

If you have any questions on this information, please contact me (ext. 2817).

Sincerely,

THE BABCOCK & WILCOX COMPANY

Tayte J. H. Taylor

Manager, Licensing

Enclosures

cc: R. B. Borsum (B&W)

efc

bcc: w/o attachment L. A. Walton R. V. DeMars K. O. Stein K. K. Yoon T. L. Baldwin File 20A10.1