



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555-0001

March 7, 1994

Docket Nos. 50-317
and 50-318

Mr. N. M. Cole
MPR Associates, Inc.
320 King Street
Alexandria, Virginia 22314-3238

Dear Mr. Cole:

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE -
CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 1 (TAC NO. M88157) AND
UNIT 2 (TAC NO. M88158)

By letter dated November 1, 1993, Baltimore Gas and Electric Company submitted a request for NRC authorization to utilize an alternative roll/plug-type repair should a leak develop through a crack in the Calvert Cliffs' pressurizer Inconel 600 heater sleeves or instrument nozzles. The submittal included a MPR Associates, Inc. (MPR) report, "Calvert Cliffs Nuclear Power Plant Units 1 and 2 Pressurizer Inconel 600 Sleeve Nozzle Safety Analysis Report for Alternative Roll/Plug Repairs" (Proprietary), dated October 15, 1993. An accompanying affidavit dated October 13, 1993, for MPR requested that the report be withheld from public disclosure and provided information to support this request. A non-proprietary version of the report was included in the submittal.

The MPR affidavit stated that public disclosure of the information is likely to cause substantial harm to the competitive position of MPR Associates because:

- a. A similar repair is performed and sold by major pressurized water reactor competitors of MPR Associates.
- b. Development of these repair designs by MPR Associates required thousands of manhours and hundreds of thousands of dollars. To the best of my knowledge and belief, a competitor would have to undergo similar expense in generating equivalent information.
- c. In order to acquire such information, a competitor would also require considerable time and inconvenience to develop these repair designs.
- d. The information consists of repair designs for pressurizer Inconel 600 sleeve type nozzle in-service cracking, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their designs to better compete with MPR Associates, take marketing or other actions to improve their position or impair the position of MPR Associates' design, and avoid developing similar data and analyses in support of their design methods or apparatus.

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- e. In pricing MPR Associates products and services, significant research, development, engineering, analytical, manufacturing, quality assurance and other costs and expenses must be included. The ability of MPR Associates' competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.
- f. Use of the information by competitors in the international marketplace would increase their ability to market such repair designs by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on MPR Associates' potential for obtaining or maintaining foreign licensees.

We have reviewed your submittal and the material based on the requirements and criteria of 10 CFR 2.790 and, on the basis of MPR's statements, have determined that the submitted information sought to be withheld contains trade secrets or proprietary commercial information.

Therefore, the report entitled, "Calvert Cliffs Nuclear Power Plant Units 1 and 2 Pressurizer Inconel 600 Sleeve Nozzle Safety Analysis Report for Alternative Roll/Plug Repairs," marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.790(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You should also understand that the NRC may have cause to review this determination in the future, such as if the scope of a Freedom of Information Act request includes


Mr. N. M. Cole

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March 7, 1994

your information. In all review situations, if the NRC needs additional information from you or makes a determination adverse to the above, you will be notified in advance of any public disclosure.

Sincerely,



Daniel G. McDonald, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

Mr. N. M. Cole
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cc:

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Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 and 2

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your information. In all review situations, if the NRC needs additional information from you or makes a determination adverse to the above, you will be notified in advance of any public disclosure.

Sincerely,

Original signed by:

Daniel G. McDonald, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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DATE	2/24/94	2/25/94	2/24/94	3/7/94	3/7/94

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