



Southern California Edison Company

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June 22, 1994

WALTER C. MARSH
MANAGER OF NUCLEAR REGULATORY AFFAIRS

TELEPHONE
(714) 454-4403

U. S. Nuclear Regulatory Commission
Attention: Document Cont. 1 Desk
Washington, D.C. 20555

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362
Revision to Supplemental Response to Generic Letter 92-01, Revision 1,
"Reactor Vessel Structural Integrity, 10 CFR 50.54(f)"
San Onofre Nuclear Generating Station
Units 2 and 3**

- References:
1. R. M. Rosenblum to U. S. Nuclear Regulatory Commission Document Control Desk, Response to Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)" San Onofre Nuclear Generating Station, Units 2 and 3, July 6, 1992
 2. W. C. Marsh to U. S. Nuclear Regulatory Commission Document Control Desk, Docket Nos. 50-361 and 50-362 Supplemental Response to Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)" San Onofre Nuclear Generating Station Units 2 and 3, January 29, 1993
 3. W. C. Marsh to U. S. Nuclear Regulatory Commission Document Control Desk, Docket Nos. 50-361 and 50-362 Revision to Supplemental Response to Generic Letter 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)" San Onofre Nuclear Generating Station Units 2 and 3, February 2, 1994

On March 6, 1992, the NRC issued Generic Letter 92-01, Revision 1, to obtain information needed to assess compliance with the requirements and commitments regarding reactor vessel integrity. Reference 1 and 2 provided our initial and supplemental response to Generic Letter 92-01.

The supplemental response indicated that we needed to obtain additional information to confirm several heat numbers and assumptions contained in our response. Reference 3 stated that the final information was transmitted to Edison from ABB/CE by letter dated January 4, 1994 and that our final response would be submitted by June 27, 1994. This submittal provides our final response to GL 92-01.

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W. C. Marsh
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As we noted in Reference 3, the new information received from ABB/CE did not change any of the analysis results contained in Reference 2. This submittal incorporates a revised methodology for determining the initial RT_{NDT} of the surveillance material, and additional materials data obtained from Combustion Engineering.

Specifically, this submittal provides the following:

Unit 2

- The heat number, chemistry, and Charpy data for welds 2-203 A, B, and C.
- The weld wire and flux combinations, chemistry, and Charpy data for weld 8-203.
- The weld wire and flux combinations for the surveillance weld.
- Description of revised methodology for determining initial RT_{NDT} . For Unit 2, there was no change in the resultant values for RT_{NDT} .

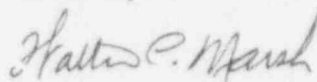
Unit 3

- The weld wire and flux combination, chemistry, and Charpy data for weld 8-203.
- The heat number for the surveillance weld.
- Description of revised methodology for determining initial RT_{NDT} . This resulted in a decrease to the initial RT_{NDT} value of the surveillance plate material.

Please note that the reports enclosed in Attachments A and B contain proprietary information from Combustion Engineering, Inc. (CE), and should be withheld from public disclosure. A signed affidavit from CE which addresses the considerations in 10 CFR 2.790(b)(4) and supports the request for non-public disclosure is provided in Attachment C of this letter. Thus, we request that the reports containing information proprietary to CE be withheld from public disclosure in accordance with 10 CFR 2.790. Separate non-proprietary versions of the report are provided in Attachments D and E.

If you have questions or require their information, please let me know.

Sincerely,



cc: L. J. Callan, Regional Administrator, NRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

Attachment C

Affidavit Pursuant to 10 CFR 2.790

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

Combustion Engineering, Inc.)
State of Connecticut)
County of Hartford) SS.:

I, S. A. Toelle, depose and say that I am the Manager, Nuclear Licensing, of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conjunction with the application of Southern California Edison Company and in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in the following documents:

San Onofre Nuclear Generating Station, Unit 2 Response to Generic Letter 92-01, Revision 2, May 19, 1994, Prepared by: ATI Consulting, San Ramon, CA and Sartrex Corporation, Rockville, MD. Appendices B, C, D, and E.

San Onofre Nuclear Generating Station, Unit 3 Response to Generic Letter 92-01, Revision 2, May 19, 1994, Prepared by: ATI Consulting, San Ramon, CA and Sartrex Corporation, Rockville, MD. Appendices B, C, D, and E.

These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for

consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1. The information sought to be withheld from public disclosure, which is owned and has been held in confidence by Combustion Engineering, is the fabrication specifications, material certifications, and chemical analysis for the reactor vessel plate and welding materials.
2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to Combustion Engineering.
3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F. M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject document herein is proprietary.

4. The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:
 - a. A similar product is manufactured and sold by major pressurized water reactor competitors of Combustion Engineering.
 - b. Development of this information by C-E required thousands of manhours and millions 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 similar fabrication specifications, material certifications, and chemical analysis for the reactor vessel plate and welding materials.

- d. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.
- e. The information consists of the fabrication specifications, material certifications, and chemical analysis for the reactor vessel plate and welding materials, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- f. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.
- g. Use of the information by competitors in the international marketplace would increase their ability to market nuclear

steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.

S. A. Toelle

S. A. Toelle
Manager
Nuclear Licensing

Sworn to before me
this 7th day of June, 1994

Laurie G. White
Notary Public

My commission expires: 8/31/99