



**Entergy  
Operations**

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April 16, 1992

2CAN049201

PROPRIETARY

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

Subject: Arkansas Nuclear One - Unit 2  
Docket No. 50-368  
License No. NFP-6  
Information Concerning the Kinetic  
Weld Devices to be Used in the Steam  
Generator Tube Sleeving Process

Gentlemen:

Recently, Entergy Operations received a verbal request from Mr. Bruce Earnest of the NRC Region IV staff concerning the explosive nature of the kinetic weld devices (KWDs) that are being used in the sleeving process for the Arkansas Nuclear One, Unit 2 (ANO-2) steam generator tubes. The purpose of this submittal is to provide the requested information.

Babcock and Wilcox (B&W) has developed a process to repair steam generator tubes. This process includes a sleeve with KWDs as part of the sleeve. When the sleeve is in place, the kinetic charge is detonated which performs the weld. A description of the complete repair process was provided in B&W Topical Report BAW-2045(P), "Recirculating Steam Generator Kinetic Sleeve Qualification for 3/4 Inch OD Tubes", Revision 0. The use of this Topical Report was approved by the Staff in letter dated January 4, 1990.

Attachment 2 provides information related to the kinetic charge used at the Trojan Nuclear Power Plant. These kinetic charges are similar to the charges being used at ANO-2.

Attachment 3 is a letter from the Bureau of Alcohol, Tobacco and Firearms to B&W. In this letter, the Bureau stated that the explosives actuated device does not constitute a public safety or security hazard and consequently these devices, when fully assembled, are not subject to regulation as an explosive.

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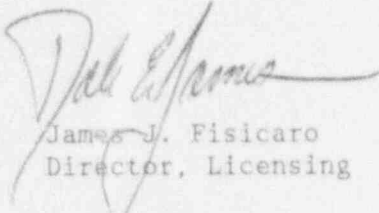
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Currently, ANO-2 plans to have a total of approximately 600 sleeves with the KWDS assembled in the sleeve on site during the current forced outage. Procedures are currently in place to control the sleeves. Because of their limited explosive nature, ANO does not consider these devices to represent a threat of radiological sabotage.

The information contained in Attachments 2 and 3 is considered proprietary to B&W. This information is being submitted under B&W Affidavit pursuant to 10CFR2.790 (Attachment 1).

Therefore, Entergy Operations requests that the attached information be withheld from public disclosure. Should you have any questions regarding this submittal, please contact me.

Very truly yours,

  
James J. Fisicaro  
Director, Licensing

JJF/RWC/sjf  
Attachments

cc: Mr. Robert Martin  
U. S. Nuclear Regulatory Commission  
Region IV  
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NRC Senior Resident Inspector  
Arkansas Nuclear One - ANO-1 & 2  
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U. S. Nuclear Regulatory Commission  
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ATTACHMENT 1

AFFIDAVIT OF JAMES H. TAYLOR

- A. My name is James H. Taylor. I am Manager of Licensing Services in the B&W Nuclear Service Company (BWNS), which is a part of B&W Nuclear Technologies (BWNT), and as such I am authorized to execute this Affidavit.
- B. I am familiar with the criteria applied by B&W to determine whether certain information of B&W is proprietary and I am familiar with the procedures established within B&W, particularly the Nuclear Services Company, to ensure the proper application of these criteria.
- C. In determining whether a B&W document is to be classified as proprietary information, an initial determination is made by the Unit Manager, who is responsible for originating the document, as to whether it falls within the criteria set forth in Paragraph D hereof. If the information falls within any one of these criteria, it is classified as proprietary by the originating Unit Manager. This initial determination is reviewed by the cognizant Section Manager. If the document is designated as proprietary, it is reviewed again by Licensing personnel and other management within BWNS as designated by the Manager of Licensing Services to assure that the regulatory requirements of 10 CFR Section 2.790 are met.
- D. The following information is provided to demonstrate that the provisions of 10 CFR Section 2.790 of the Commission's regulations have been considered:
- (i) The information has been held in confidence by B&W. Copies of the document are clearly identified as proprietary. In addition, whenever B&W transmits the

AFFIDAVIT OF JAMES H. TAYLOR (Cont'd.)

information to a customer, customer's agent, potential customer or regulatory agency, the transmittal requests the recipient to hold the information as proprietary. Also, in order to strictly limit any potential or actual customer's use of proprietary information, the following provision is included in all proposals submitted by B&W, and an applicable version of the proprietary provision is included in all of B&W's contracts:

"Purchaser may retain Company's proposal for use in connection with any contract resulting therefrom, and, for that purpose, make such copies thereof as may be necessary. Any proprietary information concerning Company's or its Supplier's products or manufacturing processes which is so designated by Company or its Suppliers and disclosed to Purchaser incident to the performance of such contract shall remain the property of Company or its Suppliers and is disclosed in confidence, and Purchaser shall not publish or otherwise disclose it to others without the written approval of Company, and no rights, implied or otherwise, are granted to produce or have produced any products or to practice or cause to be practiced any manufacturing processes covered thereby.

Notwithstanding the above, Purchaser may provide the NRC or any other regulatory agency with any such proprietary information as the NRC or such other agency may require; provided, however, that Purchaser shall first give Company written notice of such proposed disclosure and Company shall have the right to amend such proprietary information so as to make it non-proprietary. In the event that Company cannot amend such proprietary information, Purchaser



AFFIDAVIT OF JAMES H. TAYLOR (Cont'd.)

shall, prior to disclosing such information, use its best efforts to obtain a commitment from NRC or such other agency to have such information withheld from public inspection.

Company shall be given the right to participate in pursuit of such confidential treatment."

- (ii) The following criteria are customarily applied by B&W in a rational decision process to determine whether the information should be classified as proprietary. Information may be classified as proprietary if one or more of the following criteria are met:
- a. Information reveals cost or price information, commercial strategies, production capabilities, or budget levels of B&W, its customers or suppliers.
  - b. The information reveals data or material concerning B&W research or development plans or programs of present or potential competitive advantage to B&W.
  - c. The use of the information by a competitor would decrease his expenditures, in time or resources, in designing, producing or marketing a similar product.
  - d. The information consists of test data or other similar data concerning a process, method or component, the application of which results in a competitive advantage to B&W.
  - e. The information reveals special aspects of a process, method, component or the like, the exclusive use of which results in a competitive advantage to B&W.

AFFIDAVIT OF JAMES H. TAYLOR (Cont'd.)

- f. The information contains ideas for which patent protection may be sought.

The document(s) listed on Exhibit "A", which is attached hereto and made a part hereof, has been evaluated in accordance with normal B&W procedures with respect to classification and has been found to contain information which falls within one or more of the criteria enumerated above. Exhibit "B", which is attached hereto and made a part hereof, specifically identifies the criteria applicable to the document(s) listed in Exhibit "A".

- (iii) The document(s) listed in Exhibit "A", which has been made available to the United States Nuclear Regulatory Commission was made available in confidence with a request that the document(s) and the information contained therein be withheld from public disclosure.
- (iv) The information is not available in the open literature and to the best of our knowledge is not known by Combustion Engineering, EXXON, General Electric, Westinghouse or other current or potential domestic or foreign competitors of B&W.
- (v) Specific information with regard to whether public disclosure of the information is likely to cause harm to the competitive position of B&W, taking into account the value of the information to B&W; the amount of effort or money expended by B&W developing the information; and the ease or difficulty with which the information could be properly duplicated by others is given in Exhibit "B".

- E. I have personally reviewed the document(s) listed on Exhibit "A" and have found that it is considered proprietary by B&W because it contains information which falls within one or more of the





EXHIBITS A & B

EXHIBIT A

- 1) Proprietary Letter from W. Miller (Department of the Treasury) to Josef A. Lauer (B&W), dated July 5, 1989.
- 2) BWNS Proprietary Memo from J. A. Lauer to J. J. Canning, dated January 13, 1992; Subject: Shipment of Contaminated Explosives.

EXHIBIT B

The above listed document contains information which is considered Proprietary in accordance with Criteria b, c, d, and e of the attached affidavit.

ATTACHMENT 2