

Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

ComEd

January 17, 1996

Nuclear Regulatory Commission
Washington, D.C 20551

Attn: Document Control Desk

Subject: Additional Information Pertaining to the Application for Amendment to Facility
Operating Licenses for Steam Generator Tube Sleeves

Byron Nuclear Power Station, Units 1 and 2
Braidwood Nuclear Power Station, Units 1 and 2
NRC Docket Numbers: 50; 454, 455, 456 and 457

- References:
1. H. Pontious letter to the Nuclear Regulatory Commission dated May 17, 1995, transmitting Application for Amennment to Install ABB/CE TIG Sleeves into Steam Generator Tubes
 2. C. Patel letter to R. Barkhurst (Entergy Operations) dated July 11, 1995, transmitting Request for Additional Information
 3. C. Patel letter to R. Barkhurst (Entergy Operations) dated September 1, 1995, transmitting Request for Additional Information
 4. C. Patel letter to R. Barkhurst (Entergy Operations) dated December 14, 1995, transmitting Safety Evaluation

Reference 1 transmitted Commonwealth Edison Company's (ComEd) request to amend the Byron and Braidwood Units 1 and 2 Technical Specification to permit the steam generator tubes to be repaired using the tungsten inert gas (TIG) welded sleeve installed by Combustion Engineering (ABB/CE). Concurrent with ComEd's submittal, the Nuclear Regulatory Commission (NRC) was also reviewing the same request for approval of the sleeve for Waterford 3. As a result of the Staff's review of Waterford's request, the Referenced RAIs were issued. Subsequent to their issuance, Waterford submitted to the Staff CEN 625-P, "Verification of the ABB-CENO Steam Generator Tube Sleeve Installation Process and Operating Performance." Per conversations with the Staff, ComEd is submitting a similar document that addresses Byron and Braidwood specifics of the sleeving process. Attached you will find:

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- Attachment 1. CEN-627-P: "Verification of the Installation Process and Operating Performance of the ABB CENO Steam Generator Tube Sleeve for use at Commonwealth Edison Byron and Braidwood Units 1 & 2," and
- Attachment 2. CEN-627-NP(non proprietary): "Verification of the ABB-CENO Steam Generator Tube Sleeve Installation Process and Operating Performance."

On December 14, 1995, the NRC found the Waterford submittal acceptable and issued a Safety Evaluation Report which permits the use of the ABB/CE sleeve.

As CEN-627-P, contains information proprietary to ABB Combustion Engineering, Inc., it is supported by an affidavit (Attachment 3) signed by ABB Combustion Engineering, Inc., the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, it is respectfully requested that the information which is proprietary to ABB Combustion Engineering, Inc. be withheld from public disclosure in accordance with 10 CFR 2.790 of the Commission's regulations.

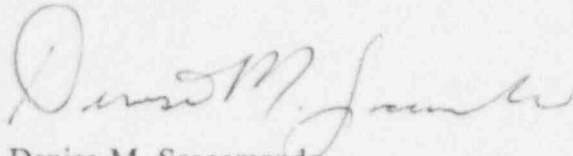
Correspondence with respect to the proprietary aspects of the items listed above or the supporting ABB Combustion Engineering, Inc. Affidavit should reference CEN-627-P and should be addressed to W.R. Gahwiller, Director, Operations Licensing, ABB Combustion Engineering, Inc., 1000 Prospect Hill Road, P. O. Box 500, Windsor, Connecticut, 06095-0500.

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

January 17, 1996

If you have any questions concerning this correspondence please contact this office.

Sincerely,



Denise M. Saccomando
Senior Nuclear Licensing Administrator



Jacqueline T. Evans 1/17/96

Attachments

cc: D. Lynch, Senior Project Manager-NRR
G. Dick, Byron Project Manager-NRR
R. Assa, Braidwood Project Manager-NRR
C. Phillips, Senior Resident Inspector-Braidwood
H. Peterson, Senior Resident Inspector-Byron
H. Miller, Regional Administrator-RIII
Office of Nuclear Safety-IDNS

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

I, Ian C. Rickard, depose and say that I am the Director, Operations 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 conformance with the provisions of 10 CFR 2.790 of the Commission's regulations and in conjunction with the application of Commonwealth Edison for withholding this information.

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

CEN-627-P, Rev. 00-P, "Verification of the Installation Process and Operating Performance of the ABB CENO Steam Generator Tube Sleeve for Use at Commonwealth Edison Byron and Braidwood Units 1 & 2," January 1995.

This document has 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.

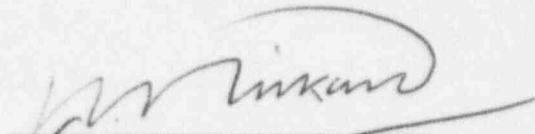
1. The information sought to be withheld from public disclosure is owned and has been held in confidence by Combustion Engineering. It consists of design and development information regarding ABB CENO welded steam generator tube sleeves.
2. The information is of a type customarily held in confidence 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.
3. 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.
4. 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.

5. 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 Combustion Engineering required millions of dollars and thousands of manhours of effort. 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 design and develop welded steam generator tube sleeves.
 - d. The information consists of design and development information regarding ABB CENO welded steam generator tube sleeve, 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.
 - e. 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.

- f. 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.

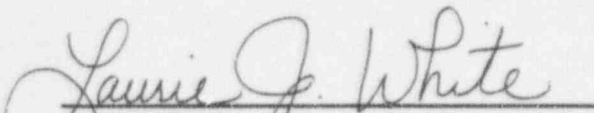
Further the deponent sayeth not.



Ian C. Rickard
Director
Operations Licensing

Sworn to before me

this 12th day of January, 1996



Notary Public
My commission expires: 8/31/99

ATTACHMENT 2

CEN-627-NP

Verification of the Installation Process and Operating Performance of the ABB
CENO Steam Generator Tube Sleeve for use at Commonwealth Edison Byron
and Braidwood Units 1 & 2