



SD-483

Integrated Nuclear Services

January 15, 1997
JHT/97-3

Ms. Kristine M. Thomas, Project Manager
Project Directorate IV-2
Division of Reactor Projects - III/IV
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Mail Stop OWFN-13E16
Washington, DC 20555-0001

Subject: "Proprietary" Responses to Request for Additional Information (RAI) Regarding Union Electric Company's Request for Amendment to the Technical Specifications for Callaway Plant, Unit 1

- References:
1. Letter to Mr. Donald Schnell (Union Electric Company) from Kristine M. Thomas (NRC), dated July 25, 1996; Subject: "Request for Additional Information (RAI) Regarding Union Electric Company's Request for Amendment to the Technical Specifications for Callaway Plant, Unit 1 (ULNRC-3358) (TAC No. M95204)."
 2. Letter to NRC Document Control Desk from Donald F. Schnell (Union Electric Company), dated September 24, 1996, "Callaway Plant Docket No. 50-483, Revision to Technical Specification 3/4.4 - Reactor Coolant System (ULNRC-3451) (TAC No. M95204)."
 3. Memorandum to William H. Bateman (NRC) from Kristine M. Thomas (NRC) dated December 17, 1996; Subject: "Forthcoming Meeting with Union Electric Company Regarding Callaway Plant, Unit 1."

Dear Ms. Thomas:

Please find enclosed the FTI "Proprietary" information presented today, January 15, 1997, to complete the responses to the NRC's questions (Reference 3) related to the NRC's review of Topical Report BAW-10219P, Rev. 1, "Electrosleeving Qualification for PWR Recirculating Steam Generator Tube Repair."

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APP 1

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PDR ADUCK 05000483
P PDR

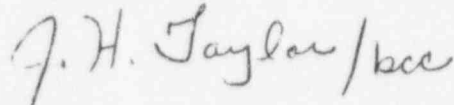
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NRC PDR 1 1 w/o Prop.

Framatome Technologies, Inc. (FTI) has determined that information associated with the installation process for electrosleeves is "Proprietary," and is thereby supported by an affidavit signed by Framatome, 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 10CFR2.790. Accordingly, it is respectfully requested that the information which is "Proprietary" to Framatome be withheld from public disclosure in accordance with 10CFR2.790.

Also, please find enclosed the Non-Proprietary information is provided separately and consists of only a few pages.

Should there be any follow-up information required, please contact us as promptly as possible in the interest of completing this review expeditiously. You may call me at 804/832-2817 or Mr. Jim Galford at 804/832-3338.

Very truly yours,



J. H. Taylor, Manager
Licensing Services

JHT/bcc

Enclosures

c: Document Control Desk (10 copies)
G. P. Hornseth (1 copy)
Donald Schnell/Union Electric Co. (1 copy)
Ed Kahl/Union Electric Co. (1 copy)
J. E. Galford/FTI-MR11
R. B. Borsum/FTI-MD82

AFFIDAVIT OF JAMES H. TAYLOR

- A. My name is James H. Taylor. I am Manager of Licensing Services for Framatome Technologies, Inc. (FTI), and as such, I am authorized to execute this Affidavit.
- B. I am familiar with the criteria applied by FTI to determine whether certain information of FTI is proprietary and I am familiar with the procedures established within FTI to ensure the proper application of these criteria.
- C. In determining whether an FTI 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 FTI 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 FTI. Copies of the document are clearly identified as proprietary. In addition, whenever FTI transmits the 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 substance of the following provision is included in all agreements entered into by FTI, and an equivalent version of the proprietary provision is included in all of FTI's proposals:

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

"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 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."

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

- (ii) The following criteria are customarily applied by FTI 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 FTI, its customers or suppliers.
 - b. The information reveals data or material concerning FTI research or development plans or programs of present or potential competitive advantage to FTI.
 - 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 FTI.
 - 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 FTI.
 - f. The information contains ideas for which patent protection may be sought.

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

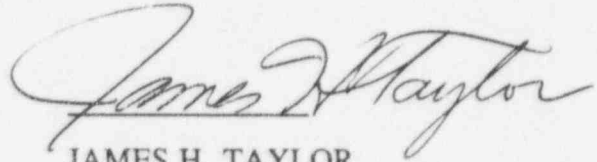
The document(s) listed on Exhibit "A", which is attached hereto and made a part hereof, has been evaluated in accordance with normal FTI procedures with respect to classification and has been found to contain information which falls within one or more of the criteria enumerated above. Exhibit "B", which 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 FTI.
- (v) Specific information with regard to whether public disclosure of the information is likely to cause harm to the competitive position of FTI, taking into account the value of the information to FTI; the amount of effort or money expended by FTI 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 FTI because it contains information which falls within one or more of the criteria enumerated in Paragraph D, and it is information which is customarily held in confidence and protected as proprietary information by FTI. This report comprises information

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

utilized by FTI in its business which afford FTI an opportunity to obtain a competitive advantage over those who may wish to know or use the information contained in the document(s).

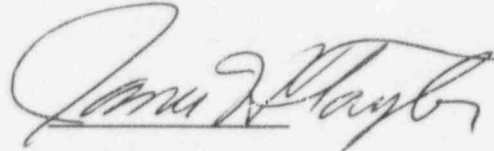

JAMES H. TAYLOR

State of Virginia)

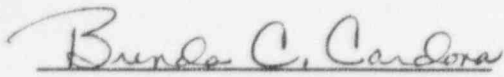
) SS. Lynchburg

City of Lynchburg)

James H. Taylor, being duly sworn, on his oath deposes and says that he is the person who subscribed his name to the foregoing statement, and that the matters and facts set forth in the statement are true.


JAMES H. TAYLOR

Subscribed and sworn before me
this 13th day of January 1997.


Notary Public in and for the City
of Lynchburg, State of Virginia.

My Commission Expires July 31, 1999

EXHIBITS A & B

EXHIBIT A

"Electrosleeve™ Review Meeting Non-Destructive Examination," January 15, 1997 (handouts).

EXHIBIT B

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

**Electrosleeve™ Review Meeting
Non-Destructive Examination
January 15, 1997**

**Callaway Plant
Docket No. 50-483
TAC No. M95402**

**Reference
USNRC RAI, December 17, 1996
FTI Topical BAW-1021P, Rev. 01, March 1996**

NON-PROPRIETARY

**Framatome Technologies, Inc.
Integrated Nuclear Services
155 MillRidge Road
Lynchburg, VA 24502**



Electrosleeve™ Review Non-Destructive Examination Agenda

- **Introduction**
- **Structural Plugging Criteria**
 - Sleeve/Tube In-Service Criteria
 - Installation Criteria
- **NDE Qualification Approach**
 - Types of In-Service Degradation
 - Plugging Criteria Approach
- **UT System Description**
 - System Features
 - Probe Features
- **UT Qualification**
 - Qualification Samples
 - Qualification Results
 - Beam Redirection
 - Installation Defects
- **Wrap-Up**

Summary of NDE Questions (12/17/96 RAI)

- **Schedule for ECT Completion?**
- **Describe the Tube (Sleeve) Plugging Criteria**
- **Schedule for UT Qual Completion?**
 - Using Tubes with Real SCC
- **Plating Defects**
 - Describe Ability of NDE to Detect
 - Describe Acceptance Criteria
- **Which NDE Technique Will Be Used?**
 - ECT or UT
- **Describe UT Beam Redirection Effects On**
 - Ability to Detect
 - Determining Defect Size
 - Determining Sleeve Wall
- **What is the Plugging Criteria Direction?**
 - Depth Sizing, or
 - Tube vs Sleeve Region Indications, or
 - Other