



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 16, 2020

Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
FOR PALISADES NUCLEAR PLANT- RELIEF REQUEST 5-8 FOR
ALTERNATE REPAIR OF REACTOR CLOSURE HEAD PENETRATION
NOZZLES (EPID L-2020-LLR-0128)

Dear Sir or Madam:

By letter dated September 28, 2020 (Agencywide Document Access and Management System (ADAMS) Accession No. ML20272A162), Entergy Nuclear Operations Inc. (Entergy) submitted an affidavit dated September 27, 2020 (ADAMS Accession No. ML20272A165), executed by Philip A. Opsal, Manager, Product Licensing for Framatome Inc. (Framatome), which requested that the information contained in the following document be withheld from public disclosure pursuant to Section 2.390 of Title 10 of the *Code of Federal Regulations* (10 CFR):

Framatome Document Number ANP-3876, Revision 1Q1P, "Response to NRC Request for Additional Information of Palisades Relief Request Number RR 5-8, Repair of Reactor Pressure Vessel Head Penetration, Inservice Inspection Program, Fifth Ten-Year Interval."

A nonproprietary copy of this document has been placed in the U.S. Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the NRC Library in the ADAMS Accession No. ML20272A166.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- a) The information reveals details of Framatome's research and development plans and programs or their results.
- b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for Framatome.

- d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors of Framatome, and would likely cause substantial harm to the competitive position of Framatome.

The NRC staff reviewed Entergy's application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, has determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the version(s) of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(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 also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-2934 or, by email at Booma.Venkataraman@nrc.gov.

Sincerely,

/RA/

Booma Venkataraman, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

cc: Listserv

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***via e-mail**

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