



December 17, 1999  
LD-1999-0082

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Subject: Transmittal of Supplemental Photographs illustrating Corrosion Behavior  
of OPTIN Cladding at Calvert Cliffs (Proprietary Information)

Dear Sir:

ABB C-E Nuclear Power, Inc., (ABB) provides herewith for NRC use one proprietary and one non-proprietary copy of the following material. Submittal of this material was requested by the staff during a meeting with BG&E and ABB on December 14, 1999.

- *"Corrosion Behavior of OPTIN Cladding; Photographs of Fuel Rods from Calvert Cliffs,"  
Supplemental meeting materials dated December 16, 1999. (5 photos)*

Information contained in these photos is proprietary in nature. It is requested that these photos be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790 and that they be appropriately safeguarded. The reasons for the classification of this information as proprietary are delineated in the attached affidavit. Please destroy these proprietary photos after completing your review.

Please feel free to contact Virgil Paggen of my staff at 860-285-4700 or me if you have any questions.

Sincerely,  
ABB C-E Nuclear Power, Inc.



Ian C. Rickard, Director  
Nuclear Licensing

Enclosure: As Stated  
Attachment: Proprietary Affidavit  
cc: M. S. Chatterton (10B3; OWFN)

AP01

ABB Combustion Engineering Nuclear Power, Inc.

P.O. Box 500

2000 Day Hill Rd.  
Phone 860-285-9678

Windsor, CT 06095-0500  
Fax 860-285-3253

PDR ADDL 05000317

I, Ian C. Rickard, depose and say that I am the Director, Nuclear Licensing, of ABB C-E Nuclear Power, Inc. (ABB), duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and described below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

I have personal knowledge of the criteria and procedures utilized by ABB in designating information as a trade secret, privileged, or as confidential commercial or financial information. The information for which proprietary treatment is sought, and which document has been appropriately designated as proprietary, is contained in the following:

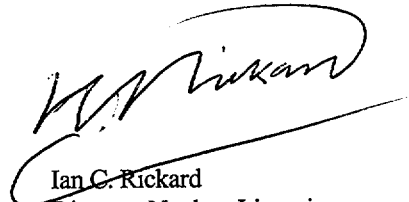
- *"Corrosion Behavior of OPTIN Cladding; Photographs of Fuel Rods from Calvert Cliffs," Supplemental meeting materials dated December 16, 1999.*

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 ABB. It consists of technical data and post-exposure evaluation results of OPTIN-clad fuel bundles.
2. The information consists of summary data or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to ABB.
3. The information is of a type customarily held in confidence by ABB and not customarily disclosed to the public.
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 that 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 ABB because:
  - a. A similar product is manufactured and sold by major competitors of ABB.
  - b. Development of this information by ABB required hundreds of thousands of dollars and thousands of manhours of effort. A competitor would have to undergo similar expense in generating equivalent information.
  - c. The information consists of technical data and qualification information for ABB-supplied products, the possession of which provides a competitive economic advantage. The availability of such information to competitors would enable them to design their product to better compete with ABB, take marketing or other actions to improve their product's position or impair the position of ABB's product, and avoid developing similar technical analysis in support of their processes, methods or apparatus.
  - d. In pricing ABB's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of ABB's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

Sworn to before me this  
17th day of December, 1999

\_\_\_\_\_



Ian C. Rickard  
Director, Nuclear Licensing



Laurie J. White  
Notary Public  
My commission expires: 8/31/03

CIG006: PROTOTYPE ROD



Typical Lamination of  $ZrO_2$  Layer [

]

Photo 1

C1G006 : PROTOTYPE ROD



Typical Appearance of Region [

]

**Photo 2**

C2N639

ROD M14

9:1 am

C2N639

ROD M14

91  $\mu$ m



CAN618

180° FACE, SPAN 7



Photo 5