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RS-01-070

April 10, 2001

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2  
Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. STN 50-454 and STN 50-455

Subject: Additional Information Supporting the License Amendment Request to Permit  
Up-rated Power Operations at Byron and Braidwood Stations

- References: (1) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC,  
"Request for a License Amendment to Permit Up-rated Power Operations at  
Byron and Braidwood Stations," dated July 5, 2000
- (2) Letter from R. M. Krich (Exelon Generation Company, LLC) to U.S. NRC,  
"Response to Request for Additional Information Regarding the License  
Amendment Request to Permit Up-rated Power Operations at Byron and  
Braidwood Stations," dated January 31, 2001

In Reference 1, we submitted proposed changes to Facility Operating License Nos. NPF-72, NPF-77, NPF-37 and NPF-66, and Appendix A, Technical Specifications (TS), for Braidwood Station, Units 1 and 2, and Byron Station, Units 1 and 2, respectively. The proposed changes would revise the maximum power level specified in each unit's license and the TS definition of rated thermal power.

In Reference 2 we provided additional information regarding various mechanical analyses performed in support of up-rated power operations. Specifically, Question J.8 requested additional information regarding flow-induced vibration in the steam generator U-bend tubes. In our response to this question, we stated that the evaluation of this issue was documented in the Babcock & Wilcox (B&W) Report, B&W-222-7720-FIV-01, "Flow-Induced Vibration Analysis Report," Revision 2, dated April 2000; and that B&W computer code EasyFIV, Version 3.3, "Flow-Induced Vibration Analysis Program for Predicting the Response of Tubes and Tube Bundles Subjected to Cross-Flow," was used for the flow induced vibration analysis. Per your request, these documents are being provided for your information.

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B&W Report, B&W-222-7720-FIV-01 and computer code, B&W EasyFIV, Version 3.3, contain information proprietary to Babcock & Wilcox; therefore, we are requesting that this information be withheld from public disclosure. Accordingly, an affidavit signed by an authorized representative of Babcock & Wilcox, the owner of the information, is provided in Attachment 1 and sets forth the basis on which the information may be withheld from public disclosure by the NRC and addresses the considerations listed in paragraph (b)(4) of 10 CFR 2.790, "Public inspections, exemptions, requests for withholding."

Should you have any questions or concerns regarding this information, please contact Mr. J. A. Bauer at (630) 663-7287.

Respectfully,

A handwritten signature in black ink, appearing to read "R. M. Krich", is written over a horizontal line.

R. M. Krich  
Director – Licensing  
Mid-West Regional Operating Group

Attachment 1: Babcock & Wilcox Affidavit  
Attachment 2: Flow Induced Vibration Analysis Report, B&W-222-7720-FIV-01, Revision 2  
Attachment 3: EasyFIV, Version 3.3, Users Manual,

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Braidwood Station  
NRC Senior Resident Inspector – Byron Station  
Office of Nuclear Safety – Illinois Department of Nuclear Safety

**ATTACHMENT 1**

**Babcock & Wilcox Affidavit**



## Babcock & Wilcox Canada

a McDermott company

581 Coronation Boulevard  
Cambridge, Ontario  
Canada N1R 5V3  
Tel: (519) 621-2130

April 5, 2001

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Mr. Samuel J. Collins

### **APPLICATION FOR WITHHOLDING PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE**

**Subject: "Flow Induced Vibration Analysis Report", Revision 2, April 2000, Report Number B&W 222-7720-FIV-01 Byron and Braidwood Stations, Unit 1 (Proprietary); and the User's Manual for B&W's Flow Induced Vibration Analysis Program, Version 3.3. (Proprietary).**

Dear Mr. Collins:

The proprietary information for which withholding is being requested is identified in the attached Affidavit signed by the owner of the proprietary information, Babcock & Wilcox Canada Ltd. The Affidavit, which accompanies this letter, 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 10 CFR Section 2.790 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Exelon Corporation.

Correspondence with respect to the proprietary aspects of the application for withholding or the Babcock & Wilcox Affidavit should reference this letter, and should be addressed to the undersigned.

Yours truly,  
BABCOCK & WILCOX CANADA LTD.

Michael D. Lees  
General Manager,  
Nuclear Steam Generators & Components

:Attch/

cc: V. J. Manica  
M.D. Lees  
G. Stables  
File/Vault – 7720

DOMINION OF CANADA

PROVINCE OF ONTARIO

JUDICIAL DISTRICT OF WATERLOO

AFFIDAVIT OF MICHAEL D. LEES

I, Michael D. Lees, of the City of Cambridge, in the Province of Ontario, being sworn, make oath and say as follows:

1. I am General Manager, Nuclear Steam Generators & Components of Babcock & Wilcox Canada Ltd. ("B&W"), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of B&W.
2. I am making this Affidavit in conformance with the provisions of 10CFR Section 2.790 of the Commission's regulations and in conjunction with the Babcock & Wilcox Canada Ltd. Application for Withholding accompanying this Affidavit.
3. I have personal knowledge of the criteria and procedures utilized by B&W in designating information as a trade secret, privileged or as confidential commercial or financial information.
4. 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 should be withheld.
  - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by B& W.
  - (ii) The information is of a type customarily held in confidence by B&W and not customarily disclosed to the public. B&W 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 application of that system and the substance of that system constitutes B&W policy and provides the rational basis required.
  - (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10CFR Section 2.790, it is to be received in confidence by the Commission.

- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is identified as "Flow Induced Vibration Analysis Report", Revision 2, April 2000, Report Number B&W 222-7720-FIV-01 Byron and Braidwood Stations, Unit 1, and the User's Manual for B&W's Flow Induced Vibration Analysis Program, Version 3.3.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of B&W because it would enhance the ability of competitors to provide similar licensing support documentation for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

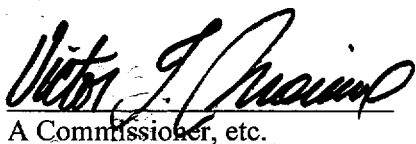
The development of the technology described by the information is the result of applying the results of many years of experience in an intensive B&W effort and the expenditure of a considerable sum of money.

In order for competitors of B&W to duplicate this information, similar design programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended for developing testing and analytical methods and performing tests.

SWORN BEFORE ME in the )  
 City of Cambridge in the )  
 Province of Ontario, this )  
 5th day of April, 2001. )



MICHAEL D. LEES



A Commissioner, etc.