

April 20, 2001

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555-0001

Gentlemen:

ULNRC-4457



**DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
ELECTRONIC VERSION OF TOPICAL REPORT BAW-10219P, REV 4
"ELECTROSLEEVE QUALIFICATION FOR PWR
RECIRCULATING STEAM GENERATOR TUBE REPAIR"
Reference: ULNRC-4391, dated February 15, 2001**

The referenced letter transmitted an amendment request to revise Callaway Technical Specifications to use Electrosleeves to repair steam generator tubes. Accompanying the transmittal were hardcopy proprietary and non-proprietary versions of Framatome ANP's (formerly Framatome Technologies) Topical Report BAW-10219, Revision 4.

Per the request of the NRC Staff this letter transmits an electronic version (CD) of Revision 4 of the Electrosleeve Topical Report.

Framatome ANP has determined that information associated with the installation process for Electrosleeves is proprietary, and is thereby supported by an affidavit signed by Framatome ANP, 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 10 CFR 2.790. Accordingly, it is respectfully requested that the information that is proprietary to Framatome ANP be withheld from public disclosure in accordance with 10 CFR 2.790.

If you have any questions on this submittal, please contact Mr. Dave Shafer at (314) 554-3104.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Alan C. Passwater".

Alan C. Passwater
Manager, Corporate Nuclear Services

*Rec'd
w/out
CD
JCD
4/25/01*

Accel

JMC/

Enclosures: 1) CD Version Topical Report (Proprietary)
2) Proprietary Affidavit

cc: M. H. Fletcher
Professional Nuclear Consulting, Inc.
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bcc: Phyllis Murdock/A160.761
/QA Record (CA-758)

E210.01

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J. M. Chapman

T. E. Herrmann

B. S. Humphries (Framatome ANP)

A140.0001 (1216)



April 9, 2001
FANP-01-1052

Mr. Alan C. Passwater
Manager, Licensing and Fuels - Nuclear
AmerenUE
1901 Chouteau Avenue
P. O. Box 66149
St. Louis, MO 63166

Subject: Topical Report BAW-10219P, Rev 04, "Electrosleeving Qualification for PWR Recirculating Steam Generator Tube Repair," December 2000, Electronic Version.

References: 1. AmerenUE's October 27, 1998 Request for Technical Specification Amendment to Approve the Installation of Framatome Technologies Incorporated Electrosleeves "on a 2 cycle basis" in the Callaway Plant Steam Generators (TAC No. M95204).
2. Nuclear Regulatory Commission Letter (Mel Gray, Project Manager, Section 2) to Garry L. Randolph, Union Electric Company, "Amendment No. 132 to Facility Operating License No. NPF-30-Callaway Plant, Unit 1 (TAC No. MA3954)," May 21, 1999.

Dear Mr. Passwater:

This letter transmits an electronic version (CD) of Revision 4 of the Electrosleeve Topical which includes the requested qualification of NDE crack depth sizing. All NDE/UT procedures have been reviewed and approved as required under industry accepted EPRI Appendix J requirements. Specifically, the "Future Considerations" identified in Reference 2 (page 19) have been addressed in this revision.

Framatome ANP (formerly Framatome Technologies) has determined that a portion of this information associated with the installation process for Electrosleeves is "Proprietary," and is thereby supported by an affidavit signed by **R.W. Ganthner, Framatome ANP** (the owner of the information). This 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 10CFR2.790. Accordingly, please submit this affidavit with your transmittal material and request that in accordance with 10CFR2.790, the NRC withhold from public disclosure the information which is Proprietary to Framatome ANP.

Please provide **Framatome ANP** a copy of your transmittal letter to the NRC, which submits this information in order for our file to be complete, and we may reference the transmittal if additional information is required.

If you have any questions, please call me at 804-832-3993.

Very truly yours,

B.S. Humphries
Senior Project Manager

BSH/lbm
Enclosures

cc: Tim Herrmann/AmerenUE
Mike Chapman/AmerenUE
R.W. Ganthner/OF49

AFFIDAVIT OF RAYMOND W. GANTHNER

- A. My name is Raymond W. Ganthner. I am Vice-President of Engineering & Licensing for Framatome ANP, Inc. (FRA-ANP), and as such, I am authorized to execute this Affidavit.
- B. I am familiar with the criteria applied by FRA-ANP to determine whether certain information of FRA-ANP is proprietary and I am familiar with the procedures established within FRA-ANP to ensure the proper application of these criteria.
- C. In determining whether an FRA-ANP 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 me 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 FRA-ANP. Copies of the document are clearly identified as proprietary. In addition, whenever FRA-ANP 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 FRA-ANP, and an equivalent version of the proprietary provision is included in all of FRA-ANP's proposals:

AFFIDAVIT OF RAYMOND W. GANTHNER (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 RAYMOND W. GANTHNER (Cont'd.)

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

AFFIDAVIT OF RAYMOND W. GANTHNER (Cont'd.)

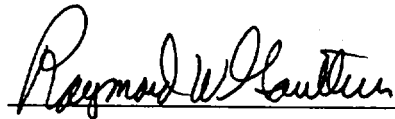
The document(s) listed on Exhibit "A", which is attached hereto and made a part hereof, has been evaluated in accordance with normal FRA-ANP procedures with respect to classification and has been found to contain information which falls within one or more of the criteria enumerated above. Exhibit "B", 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 General Electric, Westinghouse-CE, or other current or potential domestic or foreign competitors of FRA-ANP.
- (v) Specific information with regard to whether public disclosure of the information is likely to cause harm to the competitive position of FRA-ANP, taking into account the value of the information to FRA-ANP; the amount of effort or money expended by FRA-ANP 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 FRA-ANP 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 FRA-ANP. This report

AFFIDAVIT OF RAYMOND W. GANTHNER (Cont'd.)

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



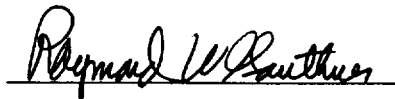
RAYMOND W. GANTHNER

State of Virginia)

) SS. Lynchburg

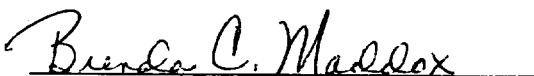
City of Lynchburg)

Raymond W. Ganthner, 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.



RAYMOND W. GANTHNER

Subscribed and sworn before me
this 9th day of April 2001.



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

*He was commissioned a notary
public as Brenda C. Cardella.*

My Commission Expires July 31, 2003

EXHIBITS A& B

EXHIBIT A

Topical Report BAW-10219P, Rev. 04, "Electrosleeving Qualification for PWR Recirculating Steam Generator Tube Repair," dated December 2000 (Electronic Version - Compact Disk).

EXHIBIT B

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