

Guy G. Campbell
Vice President - Nuclear

419-321-8588
Fax: 419-321-8337

Docket Number 50-346

License Number NPF-3

Serial Number 2743

October 30, 2001

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Request for Withholding Previously Transmitted Document from Public
Disclosure

Ladies and Gentlemen:

On October 17, 2001, the FirstEnergy Nuclear Operation Company (FENOC) transmitted supplemental information in letter Serial Number 2735 related to NRC Bulletin 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Penetration Nozzles," for the Davis-Besse Nuclear Power Station (DBNPS). Within letter Serial Number 2735 were several attachments providing supplemental supporting information for the DBNPS concerning its initial response to the bulletin. Attachment 5 of letter Serial Number 2735 is a Structural Integrity Associates, Inc. (SIA) calculation, File Number W-ENTP-11Q-306, "Finite Element Gap Analysis of CRDM Penetrations (Davis-Besse)," that has been determined to be based on information that is proprietary to Framatome ANP. A copy of this same SIA calculation had been provided informally by electronic mail to the NRC DBNPS Project Manager by the DBNPS staff on October 12, 2001. Therefore, in accordance with 10 CFR 2.790, it is requested that Attachment 5 of letter Serial Number 2735 be removed from the document, as well as any copy of that document which was electronically mailed to the NRC on October 12, 2001, and withheld from public disclosure. Attachment 1 herein contains the affidavit prepared pursuant to 10 CFR 2.790 that provides Framatome ANP's basis for the proprietary nature of the document being requested to be withheld from public disclosure.

Attachment 2 of this letter provides a proprietary-marked version of the SIA calculation to replace the calculation transmitted by Serial Number 2735. Please ensure that this proprietary version of the SIA calculation is replaced in the NRC copies of letter Serial

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Number 2735, and the attachment is removed from any copies (including electronically mailed copies) placed in the Public Document Room.

If you have any questions or require further information, please contact Mr. David H. Lockwood, Manager, Regulatory Affairs, at (419) 321-8450.

Very truly yours,

A handwritten signature in black ink, appearing to read "Guy C. Shell". The signature is fluid and cursive, with the first name "Guy" and last name "Shell" being more prominent than the middle initial "C".

RMC/s

cc: J. E. Dyer, Regional Administrator, NRC Region III
S. P. Sands, DB-1 NRC/NRR Project Manager
D. S. Simpkins, DB-1 Acting Senior Resident Inspector
Utility Radiological Safety Board

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SUPPLEMENTAL INFORMATION

IN RESPONSE TO

NRC BULLETIN 2001-01


FOR

DAVIS-BESSE NUCLEAR POWER STATION

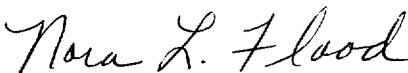
UNIT NUMBER 1

This letter is submitted pursuant to 10 CFR 50.54(f) and contains additional information concerning the supplemental response (Serial 2735, dated October 17, 2001) to NRC Bulletin 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," for the Davis-Besse Nuclear Power Station, Unit Number 1.

I, Guy G. Campbell, state that (1) I am Vice President - Nuclear of the FirstEnergy Nuclear Operating Company, (2) I am duly authorized to execute and file this certification on behalf of the Toledo Edison Company and The Cleveland Electric Illuminating Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.

By: 
Guy G. Campbell, Vice President - Nuclear

Affirmed and subscribed before me 30th day of October, 2001.


Notary Public, State of Ohio - Nora L. Flood
My commission expires September 4, 2002.

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10 CFR 2.790 Affidavit for
Structural Integrity Associates, Inc. Calculation, File Number W-ENTP-11Q-306, "Finite
Element Gap Analysis of CRDM Penetrations (Davis-Besse)"

(3 Pages Follow)

AFFIDAVIT

STATE OF WASHINGTON)
) ss.
CITY OF RICHLAND)

1. My name is Jerald S. Holm. I am Manager, Product Licensing, for Framatome ANP ("FRA-ANP"), and as such I am authorized to execute this Affidavit.
2. I am familiar with the criteria applied by FRA-ANP to determine whether certain FRA-ANP information is proprietary. I am familiar with the policies established by FRA-ANP to ensure the proper application of these criteria.
3. I am familiar with the information contained in a calculation package developed by Structural Integrity Associates, File No. W-ENTP-11Q-306. This calculation package, referred to herein as "Document," includes and the analysis described in it is based solely on proprietary information developed by FRA-ANP. Information contained in this Document has been classified by FRA-ANP as proprietary in accordance with the policies established by FRA-ANP for the control and protection of proprietary and confidential information.
4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by FRA-ANP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.
5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in the Document be withheld from public disclosure.

6. The following criteria are customarily applied by FRA-ANP to determine whether information should be classified as proprietary:

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

7. In accordance with FRA-ANP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside FRA-ANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FRA-ANP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge,
information, and belief.

Jerald S. Helm

SUBSCRIBED before me this 19th
day of October, 2001.

Valerie W. Smith

Valerie W. Smith
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 10/10/04

