



Proprietary Information – Withhold from Public Disclosure Under 10 CFR 2.390

RS-15-158

10 CFR 50.55a

June 8, 2015

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

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Response to Request for Additional Information Regarding LaSalle County Station
Relief Request I3R-14

- References:
- 1) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission, "Proposed Alternative to the Examination Requirements for Nozzle-to-Vessel Welds and Inner Radii Sections in Accordance with 10 CFR 50.55a(z)(1)," dated January 29, 2015 (ADAMS Accession No. ML15030A175)
 - 2) Email from B. Purnell (U. S. Nuclear Regulatory Commission) to L. A. Simpson (Exelon Generation Company, LLC), "LaSalle County Station, Units 1 and 2 – Request for Additional Information Regarding Relief Request I3R-14 (TAC Nos. MF5654 and MF5655)," dated May 7, 2015 (ADAMS Accession No. ML15127A210)

In Reference 1, Exelon Generation Company, LLC (EGC) submitted relief request (RR) I3R-14 for LaSalle County Station (LSCS), Units 1 and 2. RR I3R-14 is intended to apply American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (ASME Code), Code Case N-702, "Alternative Requirements for Boiling Water Reactor (BWR) Nozzle Inner Radius and Nozzle-to-Shell Welds," to reactor pressure vessel nozzles at LSCS.

In Reference 2, the U. S. Nuclear Regulatory Commission (NRC) requested additional information related to its review of RR I3R-14. Attachments 1 through 6 of this letter provide the requested information.

Attachment 3 and Attachment 5 contain proprietary information as defined by 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." The affidavit supporting the proprietary nature of the information in Attachment 3 and Attachment 5 is provided in Attachment 2. EPRI, as the owner of the proprietary information, executed the affidavit, which

Attachments 3 and 5 contain Proprietary Information. Withhold from public disclosure under 10 CFR 2.390. When separated from Attachments 3 and 5, this document is decontrolled.

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identifies that the enclosed proprietary information has been handled and classified as proprietary, is customarily held in confidence, and has been withheld from public disclosure. The proprietary information has been faithfully reproduced in the attached information such that the affidavit remains applicable. EPRI hereby requests that the attached proprietary information be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 10 CFR 9.17. Non-proprietary versions of the information contained in Attachment 3 and Attachment 5 are provided in Attachment 4 and Attachment 6, respectively.

There are no regulatory commitments contained within in this letter.

Should you have any questions concerning this letter, please contact Ms. Lisa A. Simpson at (630) 657-2815.

Respectfully,



David M. Gullott
Manager – Licensing
Exelon Generation Company, LLC

Attachments:

- 1) Response to Request for Additional Information (Non-Proprietary)
- 2) EPRI Affidavit Supporting Proprietary Nature of Information in Attachments 3 and 5 and EPRI Request for Withholding (Non-Proprietary)
- 3) Structural Integrity Associates, Inc.[®] Report, File No. 1400187.301, Revision 1, "Finite Element Model Development and Thermal Mechanical Stress Analyses for the Unit 2 N1 Nozzle," (EPRI Proprietary Information)
- 4) Structural Integrity Associates, Inc.[®] Report, File No. 1400187.301, Revision 1, "Finite Element Model Development and Thermal Mechanical Stress Analyses for the Unit 2 N1 Nozzle," (Non-Proprietary)
- 5) Structural Integrity Associates, Inc.[®] Report, File No. 1400187.302, Revision 2, "Probability of Failure for LaSalle Unit 2 N1 Nozzle-to-Shell-Welds and Nozzle Blend Radii Regions," (EPRI Proprietary Information)
- 6) Structural Integrity Associates, Inc.[®] Report, File No. 1400187.302, Revision 2, "Probability of Failure for LaSalle Unit 2 N1 Nozzle-to-Shell-Welds and Nozzle Blend Radii Regions," (Non-Proprietary)

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector, LaSalle County Station
Illinois Emergency Management Agency – Division of Nuclear Safety

Attachments 3 and 5 contain Proprietary Information. Withhold from public disclosure under 10 CFR 2.390. When separated from Attachments 3 and 5, this document is decontrolled.

ATTACHMENT 1
Response to Request for Additional Information

By letter to the U. S. Nuclear Regulatory Commission (NRC) dated January 29, 2015, Exelon Generation Company, LLC (EGC) submitted relief request (RR) I3R-14 for LaSalle County Station (LSCS), Units 1 and 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15030A175). RR I3R-14 is intended to apply American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (ASME Code), Code Case N-702, "Alternative Requirements for Boiling Water Reactor (BWR) Nozzle Inner Radius and Nozzle-to-Shell Welds," to reactor pressure vessel nozzles at LSCS.

In an email dated May 7, 2015, the NRC requested additional information to complete its review of the proposed RR.

Background

By letter dated April 19, 2013 (ADAMS Accession No. ML13071A240), the NRC approved the Boiling Water Reactor Vessel Internals Project (BWRVIP) topical report, BWRVIP-241, "Fracture Mechanics Evaluation for the Boiling Water Reactor Nozzle-to-Vessel Shell Welds and Nozzle Blend Radii," submitted on April 26, 2011 (ADAMS Accession No. ML11119A041). The NRC's safety evaluation (SE) states that BWRVIP-241 may be referenced as the technical basis for the use of ASME Code Case N-702 as an alternative. The NRC's SE further states that the licensee should address the conditions and limitations specified in the SE to demonstrate that BWRVIP-241 is applicable to the plant.

The RR states that the recirculating outlet nozzles for LSCS Unit 2 did not meet Condition 4 of the SE. Section 6, "Summary and Conclusions," of BWRVIP-241 states:

For plants having recirculation outlet nozzles with Condition 4 greater than 1.15 [i.e., does not meet Condition 4 of SE], a plant specific analysis following the approach described in this report may be able to justify values greater than 1.15. The analysis would need to be submitted to the NRC as part of a relief request to implement Code Case N-702 for the subject nozzles.

The RR does not provide an analysis to justify a value for Condition 4 greater than 1.15, but instead provides only the summary and results of the analysis. The RR indicates that the analysis is contained in Design Analysis L-003976, "Probability of Failure Analysis for Reactor Pressure Vessel Nozzles."

NRC Request

Provide a plant-specific analysis for the recirculating outlet nozzles for LSCS Unit 2 to justify a value for Condition 4 greater than 1.15.

EGC Response

The analyses performed for LSCS to implement the Code Case N-702 for the subject nozzles are provided in Attachments 2 through 6 of this letter.

ATTACHMENT 2

**EPRI Affidavit Supporting Proprietary Nature of
Information in Attachments 3 and 5 and
EPRI Request for Withholding**

(Non-Proprietary)

3 pages follow

AFFIDAVIT

RE: Request for Withholding of the Following Proprietary Information Included In:

"Probability of Failure for LaSalle Unit 2 N1 Nozzle-to-Shell-Welds and Nozzle Blend Radii Regions" included in Structural Integrity Associates, Inc. Report. Project "LaSalle N702 Relief Request for 60 Years" for Plant LaSalle County Generating Station, Units 1 and 2. File No: 1400187.302

"Finite Element Model Development and Thermal Mechanical Stress Analyses for the Unit 2 NI Nozzle" included in Structural Integrity Associates, Inc. Report. Project "LaSalle N702 Relief Request for 60 Years" for Plant LaSalle County Generating Station, Units 1 and 2. File No: 1400187.301

I, Neil Wilmshurst, being duly sworn, depose and state as follows:

I am the Vice President and Chief Nuclear Officer at Electric Power Research Institute, Inc. whose principal office is located at 1300 W WT Harris Blvd, Charlotte, NC. ("EPRI") and I have been specifically delegated responsibility for the above-listed report that contains EPRI Proprietary Information that is sought under this Affidavit to be withheld "Proprietary Information". I am authorized to apply to the U.S. Nuclear Regulatory Commission ("NRC") for the withholding of the Proprietary Information on behalf of EPRI.

EPRI Proprietary Information is identified in the above referenced report by a solid underline inside double brackets. An example of such identification is as follows:

{{This sentence is an example.^(E)}}

Tables containing EPRI Proprietary Information are identified with double brackets before and after the object. In each case, the superscript notation ^(E) refers to this affidavit as the basis for the proprietary determination.

EPRI requests that the Proprietary Information be withheld from the public on the following bases:

Withholding Based Upon Privileged And Confidential Trade Secrets Or Commercial Or Financial Information (see e.g., 10 C.F.R. § 2.390(a)(4):

a. The Proprietary Information is owned by EPRI and has been held in confidence by EPRI. All entities accepting copies of the Proprietary Information do so subject to written agreements imposing an obligation upon the recipient to maintain the confidentiality of the Proprietary Information. The Proprietary Information is disclosed only to parties who agree, in writing, to preserve the confidentiality thereof.

b. EPRI considers the Proprietary Information contained therein to constitute trade secrets of EPRI. As such, EPRI holds the Information in confidence and disclosure thereof is strictly limited to individuals and entities who have agreed, in writing, to maintain the confidentiality of the Information.

c. The information sought to be withheld is considered to be proprietary for the following reasons. EPRI made a substantial economic investment to develop the Proprietary Information and, by prohibiting public disclosure, EPRI derives an economic benefit in the form of licensing royalties and other additional fees from the confidential nature of the Proprietary Information. If the Proprietary Information were publicly available to consultants and/or other businesses providing services in the electric and/or nuclear power industry, they would be able to use the Proprietary Information for their own commercial benefit and profit and without expending the substantial economic resources required of EPRI to develop the Proprietary Information.

d. EPRI's classification of the Proprietary Information as trade secrets is justified by the Uniform Trade Secrets Act which California adopted in 1984 and a version of which has been adopted by over forty states. The California Uniform Trade Secrets Act, California Civil Code §§3426 – 3426.11, defines a "trade secret" as follows:

"Trade secret" means information, including a formula, pattern, compilation, program device, method, technique, or process, that:

(1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and

(2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy."

e. The Proprietary Information contained therein are not generally known or available to the public. EPRI developed the Information only after making a determination that the Proprietary Information was not available from public sources. EPRI made a substantial investment of both money and employee hours in the development of the Proprietary Information. EPRI was required to devote these resources and effort to derive the Proprietary Information. As a result of such effort and cost, both in terms of dollars spent and dedicated employee time, the Proprietary Information is highly valuable to EPRI.

f. A public disclosure of the Proprietary Information would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to license the Proprietary Information both domestically and internationally. The Proprietary Information can only be acquired and/or duplicated by others using an equivalent investment of time and effort.

I have read the foregoing and the matters stated herein are true and correct to the best of my knowledge, information and belief. I make this affidavit under penalty of perjury under the laws of the United States of America and under the laws of the State of North Carolina.

Executed at 1300 W WT Harris Blvd being the premises and place of business of Electric Power Research Institute, Inc.

Date: 5-19-2015

Neil Wilmschurst
Neil Wilmschurst

(State of North Carolina)
(County of Mecklenburg)

Subscribed and sworn to, (or affirmed) before me on this 19th day of May, 2015 by Neil Wilmschurst, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Deborah N. Brouse (Seal)

My Commission Expires 2nd day of April, 2016

Ref. EPRI Project Number 669

May 19, 2015

Document Control Desk
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Request for Withholding of the following Proprietary Information Included in:

"Probability of Failure for LaSalle Unit 2 N1 Nozzle-to-Shell-Welds and Nozzle Blend Radii Regions"
included in Structural Integrity Associates, Inc. Report. Project "LaSalle N702 Relief Request for 60 Years"
for Plant LaSalle County Generating Station, Units 1 and 2. File No: 1400187.302

"Finite Element Model Development and Thermal Mechanical Stress Analyses for the Unit 2 NI Nozzle"
included in Structural Integrity Associates, Inc. Report. Project "LaSalle N702 Relief Request for 60 Years"
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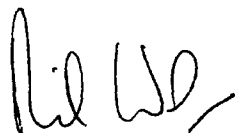
To Whom It May Concern:

This is a request under 10 C.F.R. §2.390(a)(4) that the U.S. Nuclear Regulatory Commission ("NRC") withhold from public disclosure the report identified in the enclosed Affidavit consisting of the proprietary information owned by Electric Power Research Institute, Inc. ("EPRI") identified in the attached report. Proprietary and non-proprietary versions of the Reports and the Affidavit in support of this request are enclosed.

EPRI desires to disclose the Proprietary Information in confidence to assist the NRC review of the enclosed submittal to the NRC by Exelon Generation Company, LLC. The Proprietary Information is not to be divulged to anyone outside of the NRC or to any of its contractors, nor shall any copies be made of the Proprietary Information provided herein. EPRI welcomes any discussions and/or questions relating to the information enclosed.

If you have any questions about the legal aspects of this request for withholding, please do not hesitate to contact me at (704) 595-2732. Questions on the content of the Report should be directed to Andy McGehee of EPRI at (704) 502-6440.

Sincerely,



Attachment(s)

c: Sheldon Stuchell, NRC (sheldon.stuchell@nrc.gov)

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