



FirstEnergy Nuclear Operating Company

~~WITHHOLD IN ACCORDANCE WITH 10 CFR 2.390(a)(4)~~
~~WHEN SEPARATED FROM ENCLOSURE C,~~
~~HANDLE THIS DOCUMENT AS DECONTROLLED~~

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January 23, 2017
L-17-026

10 CFR 50

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

SUBJECT:

Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License Number NPF-3
MRP-227-A Applicant Action Item 8: Time-Limited Aging Analysis (TLAA) Regarding
Reactor Vessel Internals Loss of Ductility at 60 Years

License Renewal Commitment 54, as amended by Davis-Besse Nuclear Power Station
(Davis-Besse) Updated Final Safety Analysis Report (UFSAR) Change Notice (UCN)
16-145, reads as follows:

In response to MRP-227A Applicant/Licensee Action Item 8, develop a schedule, with completion prior to the period of extended operation, for the update and submittal for NRC review and approval an evaluation for the period of extended operation regarding the effect of irradiation on the mechanical properties and deformation limits of the RV internals that was evaluated for the current term of operation in Appendix E of Topical Report BAW-10008, Part 1, Revision 1 supplemented by DB-1 [Davis-Besse] U[F]SAR Appendix 4A.

The purpose of this letter is to submit the evaluation identified in License Renewal Commitment 54.

The Enclosures listed below provide the Davis-Besse Time-Limited Aging Analysis (TLAA) Regarding Reactor Vessel Internals Loss of Ductility at 60 Years:

- A. AREVA Affidavit to Support the Disclosure Request for the Proprietary AREVA TLAA Report ANP-3542P, "Time-Limited Aging Analysis (TLAA) Regarding Reactor Vessel Internals Loss of Ductility for Davis-Besse Nuclear Power Station, Unit No. 1 at 60 Years"
- B. AREVA Report ANP-3542NP, "Time-Limited Aging Analysis (TLAA) Regarding Reactor Vessel Internals Loss of Ductility for Davis-Besse Nuclear Power Station, Unit No. 1 at 60 Years" (Non-Proprietary)

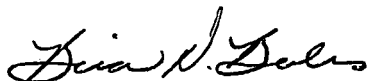
A053
NR

C. AREVA Report ANP-3542P, "Time-Limited Aging Analysis (TLAA) Regarding Reactor Vessel Internals Loss of Ductility for Davis-Besse Nuclear Power Station, Unit No. 1 at 60 Years" (Proprietary)

AREVA Report ANP-3542P (Enclosure C) documents Davis-Besse reactor vessel internals TLAA analysis details that are considered proprietary information that is to be withheld from public disclosure pursuant to 10 CFR 2.390. A non-proprietary version of the document is provided as Enclosure B. Upon removal of Enclosure C, this letter can be decontrolled.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Patrick J. McCloskey, Manager – Regulatory Compliance, at (419) 321-7274.

Sincerely,



Brian D. Boles

Enclosures:

- A. AREVA Affidavit to Support the Disclosure Request for the Proprietary AREVA TLAA Report ANP-3542P, "Time-Limited Aging Analysis (TLAA) Regarding Reactor Vessel Internals Loss of Ductility for Davis-Besse Nuclear Power Station, Unit No. 1 at 60 Years"**
- B. AREVA Report ANP-3542NP, "Time-Limited Aging Analysis (TLAA) Regarding Reactor Vessel Internals Loss of Ductility for Davis-Besse Nuclear Power Station, Unit No. 1 at 60 Years" (Non Proprietary)**
- C. AREVA Report ANP-3542P, "Time-Limited Aging Analysis (TLAA) Regarding Reactor Vessel Internals Loss of Ductility for Davis-Besse Nuclear Power Station, Unit No. 1 at 60 Years" (Proprietary)**

cc: w/o Enclosures
NRC Region III Administrator
NRR Project Manager
NRC Resident Inspector
Utility Radiological Safety Board

Enclosure A

Letter L-17-026

Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse)

AREVA Affidavit
to Support the Disclosure Request for the
Proprietary AREVA TLAA Report ANP-3542P,
"Time-Limited Aging Analysis (TLAA) Regarding
Reactor Vessel Internals Loss of Ductility for
Davis-Besse Nuclear Power Station, Unit No. 1 at 60 Years"

3 pages follow

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Tom Ryan. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in the AREVA document "ANP-3542P Revision 0, Time-Limited Aging Analysis (TLAA) Regarding Reactor Vessel Internals Loss of Ductility for Davis-Besse Nuclear Power Station, Unit No. 1 at 60 Years", and referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. 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 AREVA 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 this Document be withheld from public disclosure. The request for withholding of proprietary information is made in

accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

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

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

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(a), 6(c) and 6(d) above.

7. In accordance with AREVA'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 AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA 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.

Tan Ryan

SUBSCRIBED before me this 15th
day of December, 2016.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

