



Commonwealth Edison  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

March 18, 1983

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Dresden Station Unit 2  
Repair Program for the Twelve  
Inch Recirculation Riser Elbow  
Welds  
NRC Docket No. 50-237

Reference (a): B. Rybak letter to H. R. Denton  
dated March 1, 1983.

Dear Mr. Denton:

By this letter, we are formally submitting our repair program for the flaws found on the weld (12) inch recirculation riser elbow welds. A total of nine of the twenty (20) elbow weld joints contained crack indications. The flaw characteristics of these nine welds are summarized on Table 1 of Attachment 1; General Electric's crack growth analysis. Table 2 of Attachment 1 shows the predicted final depth at the end of the refueling cycle (18 months) for each weld.

Accordingly, it is Commonwealth Edison's intent to perform weld overlays on seven (7) welds as shown in Attachment 2 of this letter. General Electric's crack growth analysis shows the remaining two welds would remain well within proposed Code allowances at the end of the cycle precluding the need to repair these specific welds at this time. Additionally, we will commit to the following program for floor drain leakage on Unit 2.

- 1) Floor drain leakage shall be measured once every four hours when the reactor is at operating pressure - 1 gpm increase over previous four hours or when floor drain leakage equals 3 gpm total, an investigation of the cause of the leakage increase is required.

This investigation should consist of taking air samples, water samples, and review of any previous plant evolutions to the extent necessary to determine the source of leakage.

- 2) When floor drain leakage reaches 4 gpm a drywell inspection will be conducted to determine the source of leakage.

After completion of the investigation or drywell inspection, the necessity of a plant shutdown will be evaluated.

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March 18, 1983

Attachment 1 is proprietary and an affidavit is enclosed, signed by General Electric, owner of the information.

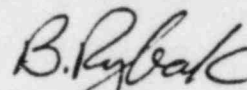
The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission, and addresses with specificity the considerations listed in paragraph (b) (4) of Section 2.790 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to General Electric Inc. be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations. Correspondence with respect to the proprietary aspects of this application for withholding or the supporting GE affidavit should be addressed to Mr. Ricardo Artigas, Manager, Safety & Licensing Operation, General Electric Company, San Jose, California.

To the best of my knowledge and belief the statements contained herein are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees and Consultants. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any questions you have to this office.

One (1) signed original and forty (40) copies of this letter are enclosed. In addition, Six (6) copies of this letter with the proprietary attachment and affidavit are also being provided at this time.



B. Rybak

Nuclear Licensing Administrator

lm

cc: Resident Inspector - Dresden  
R. Gilbert (NRR)

Attachments (1): "Evaluation of Crack Indications in the Recirculation Riser Elbow Welds - Dresden Nuclear Power Plant Unit 2," dated March 1983 - General Electric Report NEDE-30081. (Proprietary - affidavits attached).

(2): "Dresden Nuclear Generating Station Unit 2 Repair Program for Recirculation Risers", COM-52-003 Revision 4, dated March 10, 1983. Prepared by NUTECH

GENERAL ELECTRIC COMPANY

AFFIDAVIT

I, Ricardo Artigas, being duly sworn, depose and state as follows:

1. I am Manager, Safety and Licensing Operation, General Electric Company, and have been delegated the function of reviewing the information described in paragraph 2 which is sought to be withheld and have been authorized to apply for its withholding.
2. The information sought to be withheld is:  
  
"Evaluation of the Recirculation Riser Elbow Weld Crack Indications in the Dresden Nuclear Power Plant - Unit 2," NEDE-30081, March 1983.
3. In designating material as proprietary, General Electric utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement Of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.... A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information.... Some factors to be considered in determining whether given information is one's trade secret are: (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and to his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
  - a. Information that discloses a process, method or apparatus where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies;
  - b. Information consisting of supporting data and analyses, including test data, relative to a process, method or apparatus, the application of which provide a competitive economic advantage, e.g., by optimization or improved marketability;

- c. Information which if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product;
  - d. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of General Electric, its customers or suppliers;
  - e. Information which reveals aspects of past, present or future General Electric customer-funded development plans and programs of potential commercial value to General Electric;
  - f. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
  - g. Information which General Electric must treat as proprietary according to agreements with other parties.
5. In addition to proprietary treatment given to material meeting the standards enumerated above, General Electric customarily maintains in confidence preliminary and draft material which has not been subject to complete proprietary, technical and editorial review. This practice is based on the fact that draft documents often do not appropriately reflect all aspects of a problem, may contain tentative conclusions and may contain errors that can be corrected during normal review and approval procedures. Also, until the final document is completed it may not be possible to make any definitive determination as to its proprietary nature. General Electric is not generally willing to release such a document to the general public in such a preliminary form. Such documents are, however, on occasion furnished to the NRC staff on a confidential basis because it is General Electric's belief that it is in the public interest for the staff to be promptly furnished with significant or potentially significant information. Furnishing the document on a confidential basis pending completion of General Electric's internal review permits early acquaintance of the staff with the information while protecting General Electric's potential proprietary position and permitting General Electric to insure the public documents are technically accurate and correct.
6. Initial approval of proprietary treatment of a document is made by the Subsection Manager of the originating component, the man most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the Company is limited on a "need to know" basis and such documents at all times are clearly identified as proprietary.
7. The procedure for approval of external release of such a document is reviewed by the Section Manager, Project Manager, Principal Scientist or other equivalent authority, by the Section Manager of the cognizant Marketing function (or his delegate) and by the Legal Operation for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the



standards enumerated above. Disclosures outside General Electric are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees only in accordance with appropriate regulatory provisions or proprietary agreements.

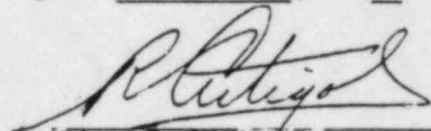
8. The document mentioned in Paragraph 2 above has been evaluated in accordance with the above criteria and procedures and has been found to contain information which is proprietary and which is customarily held in confidence by General Electric.
9. The document mentioned in Paragraph 2 above gives detailed descriptions of current methodology, assumptions, and models in the area of fracture mechanics. In addition, it describes inputs to this methodology which are a result of extensive GE test programs.
10. The information to the best of my knowledge and belief has consistently been held in confidence by the General Electric Company. No public disclosure has been made and it is not available in public sources. All disclosures to third parties have been pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
11. Public disclosure of the material sought to be withheld is likely to cause substantial harm to the competitive position of the General Electric Company and deprive or reduce the availability of profit making opportunities because:
  - a. Inputs to the methodology developed over many years with the expenditure of substantial resources exceeding \$5,000,000 by the General Electric Company. This includes the cost of construction and maintenance of the GE test facilities as well as the cost to perform the GE testing. In addition, extensive GE field data based on years of operating experience were used to obtain these results.
  - b. The resources dedicated to this effort were those of the General Electric Company.
  - c. Public availability of the material would allow competitors, including competing BWR suppliers to obtain valuable test results and obtain the capability to perform fracture mechanics evaluations at no cost, which GE developed at substantial cost. Use of this material would provide competitors a competitive advantage over General Electric by allowing competitors to offer such results and evaluations at lower cost than General Electric.

STATE OF CALIFORNIA        )  
COUNTY OF SANTA CLARA    ) ss:

Ricardo Artigas , being duly sworn, deposes and says:

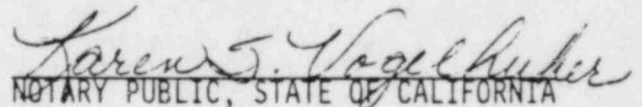
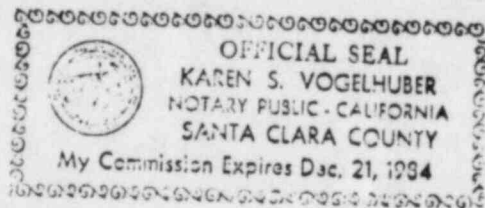
That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at San Jose, California, this 10 day of March, 1983.



Ricardo Artigas  
General Electric Company

Subscribed and sworn before me this 10 day of March 1983.

  
NOTARY PUBLIC, STATE OF CALIFORNIA

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