

# GENERAL ELECTRIC

## TURBINE OPERATIONS

GENERAL ELECTRIC COMPANY . . . . . SCHENECTADY, NEW YORK 12345  
Phone (518) 385-2211

May 18, 1981

Mr. T.A. Ippolito, Chief  
Operating Reactors-Branch 2  
Division of Operating Reactors  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555



SUBJECT: Turbine Wheel (Disc) Information for Dresden 2 and  
Quad Cities 1 Wheels with Keyway Ultrasonic Indications

Dear Mr. Ippolito;

Between September, 1980 and February, 1981, General Electric performed an ultrasonic inspection of the shrunk-on turbine wheels on the low pressure "A", "B" and "C" rotors of the Dresden 2 and Quad Cities 1 turbine-generators. Both machines are owned and operated by the Commonwealth Edison Company. Recently, we were requested by Commonwealth Edison to submit to the NRC specific information pertaining to those wheels found to contain keyway ultrasonic indications. The requested information has been prepared and is contained in Tables 1 and 2 on pages 1 and 2 of the attachment "A" hereto. An explanation of the information has also been provided in attachment A.

The data of Tables 1 and 2 are proprietary to General Electric and are so marked. These data are of the type which General Electric's Large Steam Turbine-Generator Division maintains in confidence and withholds from public disclosure. They are properly handled and classified as proprietary by General Electric as indicated by the attached affidavit.

We hereby request that these sheets and the information contained thereon be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790.

Very truly yours,

D.P. Timo, Manager  
Structural Development Engineering  
Building 41 Room 301 Phone (518) 385-4258

DPT/lar

attachments

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PAO  
ADD.  
W. ROSS  
CHANGE  
REC'D  
LPDR  
NSIC

ATTACHMENT 1

GENERAL ELECTRIC COMPANY

Affidavit of DOMINIC P. TIMO in Support  
of Request to Have Certain Technical Data  
Withheld from Public Disclosure in  
Accordance with 10 CFR 1.790

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DOMINIC P. TIMO, being duly sworn, deposes and  
states as follows:

1. I am Manager, Structural Development Engineering,  
Large Steam Turbine Generator Division (LST-G),  
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 following documents are sought to be withheld:  
  
Tables 1 and 2 entitled "Turbine Wheel  
(Disc) Information for Wheels With Key-  
way Ultrasonic Indications" for Common-  
wealth Edison turbines 170X326 (Dresden  
2) and 170X370 (Quad Cities 1) on pages  
1 and 2 of Attachment A to letter dated  
May 13, 1981 to Mr. T. A. Ippolito,  
Chief, Operating Reactors - Branch 2,  
Division of Operating Reactors, U. S.  
Nuclear Regulatory Commission,  
Washington, D. C. 20555, from  
Mr. D. P. Timo, Manager, Structural  
Development Engineering, Large Steam  
Turbine-Generator Department, General  
Electric Company, Schenectady, New York  
12345.

3. General Electric's Large Steam Turbine-Generator Division considers as proprietary any technical, financial or operating data generated by General Electric, whether patentable or not, which is used in its business, which was developed at its own expense, which is not available to others, which gives to General Electric a competitive advantage over competitors who are not in possession of such information, which it has taken steps to maintain as the exclusive property of General Electric, and which the disclosure to its competitors would be detrimental to General Electric Company.
4. Some examples of types of data which General Electric's LST-G Division considers to fall within the category of trade secrets or proprietary information, and which it endeavors to maintain exclusivity to, are:
  - a. Turbine design drawings and data unique to General Electric.
  - b. Turbine manufacturing process instructions utilized in manufacturing General Electric's turbines and known to be unique to General Electric which are of competitive value to General Electric.
  - c. Materials specifications and materials acceptance data prepared by General Electric's LST-G Division specifically for use in its products and which have characteristics which are of competitive value to General Electric, the loss of exclusivity of which would adversely affect General Electric's LST-G Division's competitive position.

- d. Product data relating to measured and calculated engineering and materials parameters of parts and components of LST-G Division's products which convey or from which one may calculate performance data of General Electric's products in terms of efficiency, reliability and permissible operating conditions. These data are highly proprietary in that, from them a competitor could calculate LST-G Division's key design criteria and tolerances which are related to the reliability of the Division's products, one of its most important competitive advantages, the loss of which would be highly detrimental to General Electric.
- e. 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.
- f. Information consisting of supporting data and analyses, including test data, relative to a process, method or apparatus, the application of which provides a competitive economic advantage, e.g., by optimization or improved marketability.
- g. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of General Electric, its customers or suppliers.

- n. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.
  - i. Information which General Electric must treat as proprietary according to agreements with other parties.
5. In addition to the foregoing material treated as proprietary by General Electric's LST-G Division, are internal engineering reports (Data Folders) assigned a classification of 2, 3 or 4 in the General Electric data classification system and which contain any of the foregoing types of data in addition to other data which are not proprietary. Such documents are generated for internal usage by LST-G Division's engineering components, are not in a form to be released to third parties, and require a mixture of proprietary and nonproprietary information in order to convey the entire picture of an engineering situation, test procedure or a report on the examination of a customer's apparatus which describes reasons for observed and measured performance.
6. Initially all drawings and internally generated engineering data within LST-G Division's engineering components are treated as proprietary due to the high probability of some of the contents thereof being within one or more of the categories of paragraphs 4 and 5 above. Additionally, such documents are generated in such quantity and by engineers and draftsmen who often are not sophisticated enough to make a determination as to whether or not proprietary data is contained therein; it is deemed the

only way to protect LST-G Division's competitive position is to treat all such documents and data as proprietary until such time as its release to third parties is contemplated. This is a conservative but effective approach. In addition to being restricted from third parties, access to such internally generated documents and data within LST-G Division is on a need-to-know basis.

7. Before any document or data relating to the products of General Electric's LST-G Division, e.g., a technical paper for presentation to a professional society, or a trade journal or a product brochure is to be made available to the general public, it is reviewed by subsection management in the component in which the action for release is initiated to determine that no data which is proprietary to General Electric is contained therein. It is then subject to review by section level management in the engineering, manufacturing and marketing functions, or a person designated by such section management, for the purpose of verifying its nonproprietary status and the appropriateness of its release. It is also reviewed by legal counsel to determine that its release will not create legal liability for General Electric Company.
8. When a document containing proprietary information is considered for a limited release outside General Electric on a restricted or limited distribution basis which normally should not adversely affect the competitive position of General Electric, e.g., to a governmental agency, or to a customer, or his agent, the appropriate functional manager at unit or

subsection level reviews the appropriateness and business risks of such releases with his section manager, and if a positive decision for a limited release of the document is made, the limited release is cleared with section level management having responsibility in engineering and marketing to further evaluate the business risks involved.

If the business benefit to be gained by limited release of the document outweighs the business risk of such release by a consensus of concerned management, the requested limited release of such document is authorized under the appropriate restrictive circumstances. Subsequent similar documents for which release is desired under similar circumstances may thereafter be released with the approval of a subsection level manager, based upon the initial decision and no significant change in facts.

Proprietary documents required by vendors for conduct of the business are routinely released by the buyers in LST-G Department Purchasing Section, but the Purchasing Section routinely requires that all such documents be stamped with restrictive markings.

Documents containing proprietary information which General Electric is obligated to provide to licensees who have accepted an obligation to maintain the same in confidence are routinely released by the Turbine Licensee Engineer (one individual) with restrictive markings.

9. The documents referenced in paragraph 2, above, have been evaluated in the light of the criteria




and practices set forth above and have been determined as proprietary to LST-G Division of General Electric as containing information, the unrestricted release of which would be detrimental to the competitive position of General Electric.

10. The documents referenced in paragraph 2 provide detailed materials and design information regarding shrunk-on wheels of General Electric's nuclear steam turbines. This information is proprietary to General Electric.

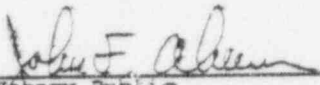
DOMINIC P. TIMO, being duly sworn, deposes and says that he has read the foregoing affidavit, and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

SIGNED at Schenectady, New York, this 15<sup>th</sup> day of May, 1981.

  
Dominic P. Timo  
General Electric Company

STATE OF NEW YORK :  
: ss.  
COUNTY OF SCHENECTADY :

Sworn to and subscribed before me this 18<sup>th</sup> day of May, 1981

  
Notary Public  
JOHN F. ASHERN  
Notary Public, State of New York  
Residing in Saratoga County  
My Commission Expires March 31, 1983