



# Utilities Service Alliance, Inc.

A Not-for-Profit, Membership Corporation  
Working Together For Mutual Success

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

Subject: United Service Alliance  
WCAP-16568-P, Jet Impingement Testing to Determine the Zone of Influence (ZOI) for DBA-Qualified/Acceptable Coatings

At the request of NRC, United Service Alliance, Inc. ("USA") is providing WCAP-16568-P (Proprietary), "Jet Impingement Testing to Determine the Zone of Influence (ZOI) for DBA-Qualified/Acceptable Coatings" for information only. No formal review is being requested by USA and therefore no NRC review fees are to be charged to USA. A non-proprietary version of this report is not available.

Enclosed is the proprietary document: WCAP-16568-P, Jet Impingement Testing to Determine the Zone of Influence (ZOI) for DBA-Qualified/Acceptable Coatings, was sent by overnight express mail with a morning delivery requested.

Also enclosed is the USA Affidavit Pursuant to 10 CFR 2.390. This affidavit sets forth the basis on the information may be withheld from the public disclosure by the Commission and the addresses with specificity the considerations listed in the paragraph (b) (4) of Section 2.390 of the Commission's regulations.

According, it is respectfully requested that this information which is proprietary to USA be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to proprietary aspects of the information listed above or the supporting USA affidavit should be addressed to Carl Parry

If you have any questions regarding the technical content of the enclosed information, please contact Mr. Maurice Dingler at (620) 364-4127.

Sincerely,

Carl E. Parry  
President and Chief Executive Officer

Enclosures (2)

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## AFFIDAVIT

STATE OF KANSAS

COUNTY OF JOHNSON

Before me, the undersigned authority, personally appeared *Carl E. Parry* who, being by me duly sworn according to law, deposes and says:

- (1) I am President and Chief Executive Officer of Utilities Services Alliance, Inc., a not-for-profit Kansas corporation ("USA"), whose members are operators of certain nuclear power plants. On behalf of USA, I have been specifically delegated the function of reviewing, for a determination of whether or not to apply for its withholding, the proprietary information sought to be withheld from public disclosure in the USA submittal of the WCAP-16568-P, Jet Impingement Testing to Determine the Zone of Influence (ZOI) for DBA-Qualified/Acceptable Coatings, and am authorized to apply for its withholding on behalf of USA.
- (2) I am making this affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with USA letter 06-07-12 Submittal of WCAP-16568-P, Jet Impingement Testing to Determine the Zone of Influence (ZOI) for DBA-Qualified/Acceptable Coatings, accompanying this affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by USA in designating information as a trade secret, privileged or as confidential commercial.
- (4) Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
  - a. The information sought to be withheld from public disclosure has been held in confidence by USA. The information is of a type customarily held in confidence by other organizations and not customarily disclosed to the public.

Based on a review of 10 CFR Section 2.390, the information to be held in confidence falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

    - (i) The information reveals the distinguishing aspects of a process or a method, where prevention of its use by any other company without license from the owner constitutes a competitive economic over advantage over other companies.
    - (2) Its consists of supporting data relative to a process or a method, the application of which secures a competitive advantage.
    - (3) Its use by another company would reduce its expenditure of resources or improve its competitive position in the design, assurance of quality, or licensing a similar product.

There are sound reasons behind the USA position which include the following:

- (1) Its is information which is marketable in many ways.
  - (2) Use by other companies would put USA at a competitive disadvantage by reducing their expenditures of resources at our expense.
  - (3) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving USA of a competitive advantage.
- b. The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, its is to be received in confidence by the Commission.
- c. The information sought to be protected is not available in public sources to the best of our knowledge and belief.
- d. The proprietary information sought to be withheld in this submittal is WCAP-16568-P, Jet Impingement Testing to Determine the Zone of Influence (ZOI) for DBA-Qualified/Acceptable Coatings.

The Subject information could only be duplicated by competitors if they were to invest time and effort equivalent to that invested by USA provided they have the requisite talent and experience.

Public disclosure of this information is likely to cause substantial harm to the competitive position of USA because it would simplify design and evaluation tasks without requiring a commensurate investment of time and effort.

- (5) The above statements are true and correct to the best of my knowledge, information and belief



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Carl E. Parry, President & Chief Executive Officer  
Utilities Service Alliance, Inc.

SUBSCRIBED and sworn to before me this 12 day of July 2006.

Marline Heathman Notary Public (Seal)

