

2008-036 _____ BWR Vessel & Internals Project (BWRVIP)

January 30, 2008

Document Control Desk
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Attention: Holly Cruz

Subject: Project No. 704 – BWRVIP-182: BWR Vessel and Internals Project, Guidance for
Demonstration of Steam Dryer Integrity for Power Update

Enclosed are five (5) copies of the report “BWRVIP-182: BWR Vessel and Internals Project, Guidance for Demonstration of Steam Dryer Integrity for Power Update,” EPRI Technical Report 1016166, January 2008. This report is being transmitted to the NRC as a means of exchanging information with the NRC for the purpose of supporting generic regulatory improvements related to power uprate and structural integrity of steam dryers.

This document provides guidance for boiling water reactor (BWR) utilities applying for a power uprate of greater than 2% of current licensed thermal power (CLTP) in demonstrating the structural integrity of their steam dryer up to the highest planned power level.

Please note that the enclosed report contains proprietary information. A letter requesting that the report be withheld from public disclosure and an affidavit describing the basis for withholding this information are provided as Attachment 1.

Two (2) copies of the non-proprietary report “BWRVIP-182NP: BWR Vessel and Internals Project, Guidance for Demonstration of Steam Dryer Integrity for Power Update,” EPRI Technical Report 1016166, January 2008, are also enclosed. This non-proprietary report is identical to the enclosed proprietary report except that the proprietary information has been deleted and the letters “NP” appear in the BWRVIP report number.

If you have any questions on this subject please call George Inch (Constellation Energy, BWRVIP Steam Dryer Focus Group Committee Technical Chairman) at 315-349-2441.

Sincerely,



Rick Libra
Exelon
Chairman, BWR Vessel and Internals Project

Together . . . Shaping the Future of Electricity

*Add copies
have been sent
to PM*

7004
NRR

CHRISTIAN B. LARSEN
Vice President and
Chief Nuclear Officer

January 30, 2008

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

Subject: Request for Withholding of the Following Commercial Document:

“BWRVIP-182: BWR Vessel and Internals Project, Guidance for Demonstration of Steam
Dryer Integrity for Power Update,” EPRI Technical Report 1016166, January 2008

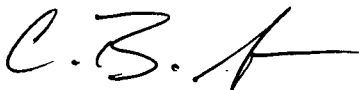
To Whom It May Concern:

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 information identified in the enclosed Affidavit consisting of the commercial information owned by Electric Power Research Institute, Inc. (“EPRI”) identified above (the “Report”). Copies of the Report and the Affidavit in support of this request are enclosed.

EPRI desires to disclose the Report in confidence as a means of exchanging technical information with the NRC”. The Report is not to be divulged to anyone outside of the NRC nor shall any copies be made of the Report 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 (650) 855-2329. Questions on the content of the Report should be directed to John Hosler of EPRI at (704) 595-2226.

Sincerely,



AFFIDAVIT

RE: Request for Withholding of the Following Commercial Document:

“BWRVIP-182: BWR Vessel and Internals Project, Guidance for Demonstration of Steam Dryer Integrity for Power Update,” EPRI Technical Report 1016166, January 2008

I, CHRISTIAN B. LARSEN, being duly sworn, depose and state as follows:

I am a Vice President and the Chief Nuclear Officer of Electric Power Research Institute, Inc. whose principal office is located at 3420 Hillview Avenue, Palo Alto, California (“EPRI”) and I have been specifically delegated responsibility for the above-listed Report that is sought under this Affidavit to be withheld (the “Report”). I am authorized to apply to the U.S. Nuclear Regulatory Commission (“NRC”) for the withholding of the Report on behalf of EPRI.

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

Withholding Based Upon Privileged And Confidential Trade Secrets Or Commercial Or Financial Information:

- a. The Report is owned by EPRI and constitutes commercial information which has not been placed in the public domain by EPRI.
- b. EPRI made a substantial economic investment to develop the Report and, by prohibiting public disclosure, EPRI derives an economic benefit in the form of fees charged for the sale of the Report. The Report is entitled to the protection of the United States copyright laws. If the Report was publicly available to consultants and/or other businesses providing services in the electric and/or nuclear power industry at no cost, these entities would be able to use the Report for their own commercial benefit and profit and without expending the substantial economic resources required of EPRI to develop the Report.
- c. EPRI made a substantial investment of both money and employee hours over an extended period of time in the development of the Report. As a result of such effort and cost, both in terms of dollars spent and dedicated employee time, the Report is highly valuable to EPRI.
- d. A public disclosure of the Report would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to sell the Report both domestically and internationally. If a party does not purchase the Report from EPRI, it would require an investment of money, time and effort equivalent to that expended by EPRI for the party to duplicate the Report.

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 California.

Executed at 3420 Hillview Avenue, Palo Alto, California being the premises and place of business of Electric Power Research Institute, Inc.

January 30, 2008

A handwritten signature in black ink, appearing to read 'C.B. Larsen', with a long horizontal flourish extending to the right.

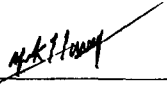
Christian B. Larsen

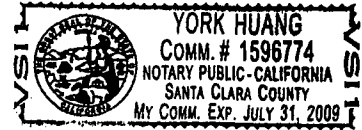
(Please see attached California Jurat form Y.H.)
Subscribed and sworn before me this day: January 30, 2008

_____, Notary Public

State of California)
County of Santa Clara)

Subscribed and sworn to (or affirmed) before me on this 30th day of January, 2008, by
Christian B. Larsen, proved to me on the basis of satisfactory
evidence to be the person(s) who appeared before me.

Signature  (Seal)



DESCRIPTION OF ATTACHED DOCUMENT

Request for withholding proprietary document
TITLE OR TYPE OF DOCUMENT

