

*- Requested
a new CD
from Gary
on 3/5/09*

February 18, 2009

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

Proj 669

Subject: Distribution of Report: Medium Voltage Cable Aging Management Guide EPRI
1016689

To Whom It May Concern:

In regard to the enclosed request for withholding of EPRI report 1016689 from public disclosure, two copies are provided for use by two U.S. NRC staff members. Please distribute one copy of each to the following staff members:

Mr. George Wilson
Branch Chief Electrical Engineering Branch NRR
Mail Stop 09E2
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Thomas Koshy, Chief
Mechanical & Electrical Engineering Branch
Division of Engineering
Office of Research
Mail Stop: T-10M05
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Your attention to this matter is appreciated.

Sincerely,



Gary J. Toman
Senior Project Manager, Plant Support Engineering

Enclosure: 2 CD versions of 1016689, MV Cable Aging Management Guide

Together . . . Shaping the Future of Electricity

CHARLOTTE OFFICE

1300 West W.T. Harris Boulevard, Charlotte, NC 28262-8550 USA • 704.595.2000 • Fax 704.595.2860
Customer Service 800.313.3774 • www.epri.com

Add:

*2035
CD-Rom
to: George Wilson
Thomas Koshy*

CHRISTIAN B. LARSEN
Vice President and
Chief Nuclear Officer

February 17, 2009

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:
Medium Voltage Cable Aging Management Guide, EPRI 1016689**

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 to assist the NRC in matters related to aging of medium voltage cables and 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 Gary J. Toman of EPRI at (704) 595-2073.

Sincerely,



AFFIDAVIT

**RE: Request for Withholding of the Following Commercial Document:
Medium Voltage Cable Aging Management Guide, EPRI 1016689**

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.

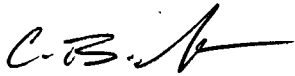
c. EPRI made a substantial investment of both money and employee hours over an extended period of time in the development of the Report. As a result of such effort and cost, both in terms of dollars spent and dedicated employee time, the Report is highly valuable to EPRI.

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.

February 17, 2009



Christian B. Larsen

State of California)
County of Santa Clara)

Subscribed and sworn to (or affirmed) before me on this 17th day of February, 2009, by Christian B. Larsen; proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature



(Seal)

