

CHRISTIAN B. LARSEN
Vice President and
Chief Nuclear Officer

June 8, 2009

PROJ 669

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 Documents:

1. "Guidelines for Inspectability for New Plant Components" – EPRI Report No. 1016651
2. "Proposed Code Case Criteria for Technical Basis of Weld Overlay Indication Evaluation and Disposition Based on Advanced Technology Assessments" – EPRI Report No. 1016652
3. "Nondestructive Evaluation: Ultrasonic Equivalency Testing of Weld Inlaid and Weld Onlaid Components" – EPRI Report No. 1016655

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 "Reports"). Copies of the Reports and the Affidavit in support of this request are enclosed.

EPRI desires to disclose the Reports in confidence as a means of exchanging technical information with the NRC. The Reports are not to be divulged to anyone outside of the NRC nor shall any copies be made of the Reports 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 Carl Latiolais of EPRI at 704-595-2140

Sincerely,



Together . . . Shaping the Future of Electricity

3420 Hillview Avenue, Palo Alto, CA 94304-1338 USA • 650.855.2329 • Fax 650.855.8759 • cblarsen@epri.com

Add: Terence Chan
to ERIDS

DOBS

AFFIDAVIT

RE: Request for Withholding of the Following Commercial Document:

1. "Guidelines for Inspectability for New Plant Components" – EPRI Report No. 1016651
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3. "Nondestructive Evaluation: Ultrasonic Equivalency Testing of Weld Inlaid and Weld Onlaid Components " – EPRI Report No. 1016655

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 Reports that are sought under this Affidavit to be withheld (the "Reports"). I am authorized to apply to the U.S. Nuclear Regulatory Commission ("NRC") for the withholding of the Reports on behalf of EPRI.

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

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

a. The Reports are 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 Reports and, by prohibiting public disclosure, EPRI derives an economic benefit in the form of fees charged for the sale of the Reports. The Reports are entitled to the protection of the United States copyright laws. If the Reports were 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 Reports for their own commercial benefit and profit and without expending the substantial economic resources required of EPRI to develop the Reports.

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

d. A public disclosure of the Reports would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to sell the Reports both

domestically and internationally. If a party does not purchase the Reports from EPRI, it would require an investment of money, time and effort equivalent to that expended by EPRI for the party to duplicate the Reports.

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.

June 8, 2009

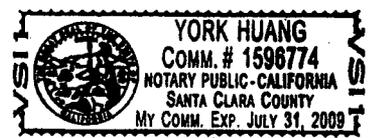


Christian B. Larsen

State of California)
County of Santa Clara)

Subscribed and sworn to (or affirmed) before me on this 8th day of June(6), 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)



6/17/09

To whom it may concern:

Attached are documents that Mr. Terence Chan with the NRC has requested from us. Please contact him when these documents are processed so he knows they are available. His phone number is 301-415-2768. Email Address is TLC@nrc.gov.

Sincerely,

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

Carl Latiolais
Senior Program Manager Appendix VIII Performance Demonstration
EPRI NDE