

MRP Materials Reliability Program _____ MRP 2009-052
(via email)

August 4, 2009

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

PROJ 669

Subject: Re-Submittal of EPRI Commercial Documents;

- 1) *Materials Reliability Program*: Screening, Categorization, and Ranking of B&W-Designed PWR Internals Component Items (MRP-189-Rev. 1). EPRI, Palo Alto, CA: 2009. 1018292.
- 2) *Materials Reliability Program*: Fracture Toughness Evaluation of Highly Irradiated PWR Stainless Steel Internal Components (MRP-210). EPRI, Palo Alto, CA: 2007. 1016106
- 3) *Materials Reliability Program*: Aging Management Strategies for B&W PWR Internals (MRP-231). EPRI, Palo Alto, CA: 2008. 1016592
- 4) *Materials Reliability Program*: Aging Management Strategies for Westinghouse and Combustion Engineering PWR Internals (MRP-232). EPRI, Palo Alto, CA: 2008. 1016593

Reference:

1. Letter and Affidavit, Christian B. Larsen (EPRI) to NRC Document Control Desk, Request for Withholding Commercial Documents, dated June 10, 2009

To Whom It May Concern:

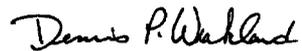
Enclosed is one copy of each of the four subject EPRI reports. These documents were originally transmitted to the Document Control Desk on June 10, 2009 by Reference 1, and are being re-submitted to include the proper markings on them in accordance with 10 CFR 2.390. This will allow you to remove the original documents from ADAMS and replace them with the updated versions.

Together . . . Shaping the Future of Electricity

DO35
MRP

If you have any questions on this subject, please contact Anne Demma (ademma@epri.com, 650-855-2026).

Sincerely,



Dennis Weakland
First Energy
Chairman, Materials Reliability Program

cc: Joe Hagan, First Energy
Ted Sullivan, NRC
Don Dyksterhouse, INPO
Mike Melton, NEI
Jim Riley, NEI
David Steininger, EPRI
Christine King, EPRI

CHRISTIAN B. LARSEN
Vice President and
Chief Nuclear Officer

June 10, 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 Documents:

Materials Reliability Program: Screening, Categorization, and Ranking of B&W-Designed PWR Internals Component Items (MRP-189-Rev. 1). EPRI, Palo Alto, CA: 2009. 1018292.

Materials Reliability Program: Fracture Toughness Evaluation of Highly Irradiated PWR Stainless Steel Internal Components (MRP-210). EPRI, Palo Alto, CA: 2007. 1016106

Materials Reliability Program: Aging Management Strategies for B&W PWR Internals (MRP-231). EPRI, Palo Alto, CA: 2008. 1016592

Materials Reliability Program: Aging Management Strategies for Westinghouse and Combustion Engineering PWR Internals (MRP-232). EPRI, Palo Alto, CA: 2008. 1016593

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 requested by NRC letter “REQUEST FOR ADDITIONAL INFORMATION RE: ELECTRIC POWER RESEARCH INSTITUTE TOPICAL REPORT 1006596, ‘MATERIALS RELIABILITY PROGRAM: PRESSURIZED WATER REACTOR INTERNALS INSPECTION AND EVALUATION GUIDELINES (MRP-227-REV. 0)’ (TAC NO. ME0680)” dated May 28, 2009. 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.

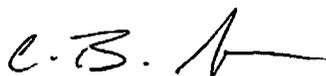
Document Control Desk

June 10, 2009

Page 2

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 Anne Demma of EPRI at (650) 855-2026.

Sincerely,

A handwritten signature in black ink, appearing to read "C. B. A." followed by a stylized flourish.

CBL/bjr

Enclosure

c: M. Melton, NEI (w/o enc)
T. Mensah, NRC (w/o enc)

AFFIDAVIT

RE: Request for Withholding of the Following Commercial Documents:

Materials Reliability Program: Screening, Categorization, and Ranking of B&W-Designed PWR Internals Component Items (MRP-189-Rev. 1). EPRI, Palo Alto, CA: 2009. 1018292.

Materials Reliability Program: Fracture Toughness Evaluation of Highly Irradiated PWR Stainless Steel Internal Components (MRP-210). EPRI, Palo Alto, CA: 2007. 1016106

Materials Reliability Program: Aging Management Strategies for B&W PWR Internals (MRP-231). EPRI, Palo Alto, CA: 2008. 1016592

Materials Reliability Program: Aging Management Strategies for Westinghouse and Combustion Engineering PWR Internals (MRP-232). EPRI, Palo Alto, CA: 2008. 1016593

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 is 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 constitute 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

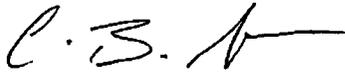
cost, both in terms of dollars spent and dedicated employee time, the Reports are highly valuable to EPRI.

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 10, 2009



Christian B. Larsen

State of California)
County of Santa Clara)

Subscribed and sworn to (or affirmed) before me on this 10th day of June, 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)

