



NUCLEAR ENERGY INSTITUTE

James H. Riley
PRINCIPAL ENGINEER
NUCLEAR GENERATION DIVISION

February 5, 2010

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

Subject: Revised Steam Generator Management Program Guidance: Steam Generator Integrity Assessment Guidelines.

Project Number: 689

The purpose of this letter is to transmit revision 3 of the EPRI Steam Generator Management Program Steam Generator Integrity Assessment guidelines for your information and use.

The Steam Generator Integrity Assessment guidelines contain proprietary information that is supported by the enclosed signed affidavit. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the consideration listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, we respectfully request that the information, which is proprietary to EPRI, be withheld from public disclosure in accordance with 10 CFR 2.790. A non-proprietary version of the guidelines is also enclosed.

If there are any questions on these matters, please contact me (202-739-8137, jhr@nei.org) or Jim Benson (704-595-255, jbenson@epri.com).

Sincerely,

A handwritten signature in black ink that reads "James H. Riley". The signature is written in a cursive, flowing style.

James H. Riley

Enclosures

c: Ms. Tanya M. Mensah, NRR/DPR/PSPB, NRC
Mr. Robert M. Taylor, NRR/DCI/CSGB, NRC
Mr. Emmett L. Murphy, NRR/DCI/CSGB, NRC
Mr. Kenneth J. Karwoski, NRR/DCI, NRC

Mr. James Benson, EPRI

DOH
LRR

February 1, 2010

Mr. James Riley
NEI
1776 I St. NW, Suite 400
Washington, DC 20006-3708

Subject: *Steam Generator Management Program: Integrity Assessment Guidelines, Revision 3.*
EPRI Palo Alto, CA: 2009. 1019038

Dear Jim:

Copies of the subject technical report are enclosed for NRC and NEI and include both proprietary and non-proprietary versions. One proprietary copy and one non-proprietary copy are for NEI. Two proprietary copies and one non-proprietary copy are provided for transmittal to the NRC.

In addition, an EPRI transmittal letter and affidavit are provided to specifically address the proprietary version of the report and should accompany the report that is sent to the NRC.

If you have questions, please contact me at 704-595-2550.

Sincerely,



James Benson
Program Manager, SGMP

Enclosure

cc: D. Steininger, Director, PWR & BWR Materials
R. Lieder, NextEra Energy, SGMP IC Chair
J. Arhar, PG&E, E&R TAC Chair

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January 20, 2010

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:

***Steam Generator Management Program: Steam Generator Integrity
Assessment Guidelines, Revision 3, 1019038***

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) 855-2064. Questions on the content of the Report should be directed to Helen Cothron of EPRI at (865) 773-4033.

Sincerely,



Tuan Nguyen
Acting Vice President, Nuclear

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PALO ALTO OFFICE

3420 Hillview Avenue, Palo Alto, CA 94304-1338 USA • 650.855.2000 • Customer Service 800.313.3774 • www.epri.com

AFFIDAVIT

RE: Request for Withholding of the Following Commercial Document:

***Steam Generator Management Program: Steam Generator Integrity
Assessment Guidelines, Revision 3, 1019038***

I, TUAN NGUYEN, being duly sworn, depose and state as follows:

I am Acting 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 20, 2010

Tuan Nguyen

Tuan Nguyen

State of California)
County of Santa Clara)

Subscribed and sworn to (or affirmed) before me on this 20th day of January, 2010, by Tuan Nguyen, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature

[Handwritten Signature]

(Seal)

