

South Carolina Electric & Gas Company

NND-13-0127

Enclosure 4

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3

LAR 13-10

Affidavit of Alfred M. Paglia

Prepared in Accordance with 10 CFR 2.390

Affidavit of Alfred M. Paglia

1. My name is Alfred M. Paglia. I am the Manager, Nuclear Licensing, for South Carolina Electric & Gas Company (SCE&G). I have been delegated the function of reviewing proprietary information sought to be withheld from public disclosure and I am authorized to apply for its withholding on behalf of SCE&G.
2. I am making this affidavit on personal knowledge, in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations, in conjunction with SCE&G's filings on dockets 52-027 and 52-028 of Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3, respectively, of Request for License Amendment 13-10, "Revision to AP1000 Human Factors Engineering Integrated System Validation Plan" submitted to the NRC under correspondence letter number NND-13-0127. I also have personal knowledge of the criteria and procedures used by SCE&G to designate information as a trade secret, privileged or as confidential, commercial or financial information.
3. Based on the criteria in 10 CFR 2.390(a)(4), this affidavit seeks to withhold from public disclosure Enclosure 1A of the VCSNS Units 2 and 3 Request for License Amendment 13-10, "Revision to AP1000 Human Factors Engineering Integrated System Validation Plan", submitted to the NRC under correspondence letter number NND-13-0127 (dockets 52-027 and 52-028 respectively).
4. The following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - a. The information sought to be withheld from public disclosure has been held in confidence by SCE&G and Westinghouse Electric Company.
 - b. The information is of a type customarily held in confidence by SCE&G and Westinghouse and not customarily disclosed to the public.
 - c. The release of the information might result in the loss of an existing or potential competitive advantage to SCE&G and/or Westinghouse.
 - d. Other reasons identified in the Westinghouse affidavit included as Enclosure 3 of VCSNS Units 2 and 3 Request for License Amendment 13-10, "Revision to AP1000 Human Factors Engineering Integrated System Validation Plan", submitted under correspondence letter number NND-13-0127 (dockets 52-027 and 52-028 respectively), are incorporated here by reference.

The information in Enclosure 1A of VCSNS Units 2 and 3 Request for License Amendment 13-10, "Revision to AP1000 Human Factors Engineering Integrated System Validation Plan" that is proprietary is contained within brackets, and where the proprietary information has been deleted in the non-proprietary version contained in Enclosure 1B, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The basis for proposing the information so designated as proprietary is indicated in Enclosures 1A and 1B by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary, pursuant to

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10 CFR 2.390(b)(1)(i)(B). These lower case letters refer to the types of information SCE&G customarily holds in confidence and are identified in Sections (4)(a) through (4)(d) of this affidavit and Sections (4)(ii)(a) through (4)(ii)(f) of the Westinghouse affidavit (Enclosure 3 of License Amendment Request 13-10) incorporated by reference into this affidavit.

5. Additionally, release of the information may harm SCE&G because SCE&G has a contractual relationship with the Westinghouse Electric Company regarding proprietary information. SCE&G is contractually obligated to seek confidential and proprietary treatment of this information.
6. To satisfy the requirements of 10 CFR 2.390(b)(1)(i)(B) and (b)(1)(ii)(E), SCE&G requests that Enclosure 1A in its entirety be withheld, but is providing a redacted version in Enclosure 1B.
7. The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390 it is to be received in confidence by the Commission.
8. To the best of my knowledge and belief, the information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method.

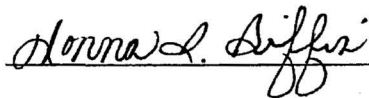
I declare under penalty of perjury that the foregoing is true and correct.



Alfred M. Paglia

Executed on 3/14/13
Date

SWORN and SUBSCRIBED to before me on this 14th day of March, 2013 in Fairfield county, South Carolina.



Notary Public
My Commission Expires: 06/18/2018