

KENNETH CANAVAN
Director, Plant Technology

Ref. EPRI Project Number 669

May 22, 2013

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 Channel Head Degradation
Failure Modes and Effects Analysis. EPRI, Palo Alto, CA: 2013. 3002000473

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 (704) 595-2731. Questions on the content of the Report should be directed to Helen Cothron of EPRI at (865) 773-4033.

Sincerely,



Attachment(s)

c: Sheldon Stuchell, NRC (sheldon.stuchell@nrc.gov)

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AFFIDAVIT

RE: Request for Withholding of the Following Commercial Document:

Steam Generator Management Program: Steam Generator Channel Head
Degradation Failure Modes and Effects Analysis. EPRI, Palo Alto, CA: 2013.
3002000473

I, Kenneth Canavan, being duly sworn, depose and state as follows:

I am the Director of Plant Technology at 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 (see e.g., 10 C.F.R. § 2.390(a)(4)):

- 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 1300 W WT Harris Blvd being the premises and place of business of Electric Power Research Institute, Inc.

Date: 05/22/2013

Kenneth Canavan
Kenneth Canavan

(State of North Carolina)
(County of Mecklenburg)

Subscribed and sworn to (or affirmed) before me on this 22nd day of May, 2013 by Kenneth Canavan, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Deborah H. Reese (Seal)

My Commission Expires 2nd day of April, 2016.