

generation
mPower

November 21, 2013

10 CFR 52

U.S. Nuclear Regulatory Commission (NRC)
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Project No. PROJ0776
Generation mPower LLC (GmP)
Submittal of Design Approach for Diversity & Defense-in-Depth, DNB Methodology Topical Report, and Reactor Coolant Pump Flywheel Design and Technical Report Contents Slides
Ltr. No. LTR-13-0087

Meetings are scheduled between GmP and NRC staff in Rockville, MD on December 10, 2013. Three sessions will be held on the topics noted in the above subject line. Participants will include technical staff from GmP, B&W mPower, Bechtel Power Corporation and the NRC staff. GmP has requested that these session be closed to the public because of the proprietary nature of the design information to be discussed.

Two sets of slides for the topics noted in the above subject line to be presented during the meetings are enclosed with this letter. A portion of the information provided in the slides is considered proprietary information. GmP requests that the proprietary information within these slides be withheld from public disclosure in accordance with the requirements of 10 CFR 2.390. Enclosure 1 is a signed affidavit that provides the justification for withholding the Proprietary information identified in Enclosures 2 through 4. Enclosures 5 through 7 are non-proprietary (redacted) versions of the slides for public release.

If you have any questions or need any additional information, please contact me at your convenience at (980) 365-2071 or at pshastings@generationmpower.com.



Peter S. Hastings
Director of Licensing
Generation mPower, LLC

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- Enclosures:
1. Affidavit
 2. Design Approach for Diversity & Defense-in-Depth Slides (Proprietary)
 3. DNB Methodology Topical Report Slides (Proprietary)
 4. Reactor Coolant Pump Flywheel Design and Technical Report Contents Slides (Proprietary)
 5. Design Approach for Diversity & Defense-in-Depth Slides (Redacted)
 6. DNB Methodology Topical Report Slides (Redacted)
 7. Reactor Coolant Pump (RCP) Flywheel Design and Technical Report Contents Slides (Redacted)

cc: J. L. Starefos, NRC, TWFN 9-F-27
S. L. Magruder, Jr, NRC, TWFN 9-F-27

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external distribution.

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Enclosure 1
AFFIDAVIT of Peter S. Hastings

AFFIDAVIT OF PETER S. HASTINGS

State of North Carolina

County of Mecklenburg

I, Peter S. Hastings, being duly sworn, do hereby depose and say:

1. I am the Director of Licensing for Generation mPower LLC (GmP). I have been delegated the responsibility for reviewing information sought to be withheld from public disclosure in connection with information being submitted to U.S. Nuclear Regulatory Commission (NRC) related to the proposed mPower Plant design certification application and I am authorized to apply for its withholding from public disclosure on behalf of GmP.

2. I am making this affidavit in conformance with the provisions of 10 CFR 2.390 of the regulations of the NRC and in conjunction with GmP's application for withholding which accompanies this affidavit.

3. I have knowledge of the criteria used by GmP in designating information as sensitive, proprietary, or confidential. I am familiar with the information contained in presentation slides entitled "Design Approach for Diversity & Defense-in-Depth, DNB Methodology Topical Report, and Reactor Coolant Pump Flywheel Design and Technical Report Contents Slides." Information contained in these documents has been classified by GmP as sensitive, proprietary, or confidential in accordance with GmP procedures.

4. Pursuant to the provision of paragraph (a)(4) of 10 CFR 2.390, the following is furnished for consideration by the NRC 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 is owned by or licensed to GmP and has been held in confidence by GmP, Babcock & Wilcox mPower, Inc. (B&W mPower), and their consultants.

b) The information sought to be protected is not publicly available to the best of our knowledge and belief.


c) The information is of the type that would customarily be held in confidence by GmP. This information includes GmP's and B&W mPower's conceptual and technical approaches regarding details of the design of the B&W mPower™ reactor systems, structures, and components and associated analysis, and classifications, disclosure of which could adversely affect our competitive position by informing competitors of the degree of maturity and viability of the program, thereby motivating them to increase efforts to develop competing technologies. All or parts of the approach described in the withheld material is patentable.

d) Release of the subject information will harm GmP because GmP will be put at a competitive disadvantage if its competitors in the small modular reactor market become aware of its proprietary information. In addition, GmP has contractual relationships with B&W mPower regarding proprietary information, and GmP is contractually obligated to seek confidential and proprietary treatment of such information.

e) The proprietary information sought to be withheld from public disclosure is identified and is marked as proprietary as it appears in the materials.

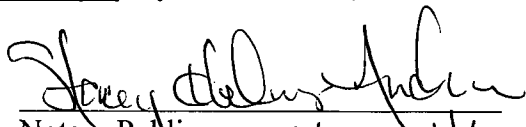
f) The information was transmitted to the NRC in confidence and under the provisions of 10 CFR 2.390; it is to be received in confidence by the NRC.

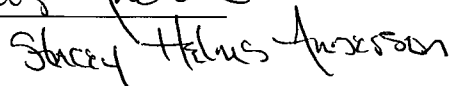
I declare under penalty of perjury under the laws of the United States of America that the foregoing is a true and correct statement of facts.



Peter S. Hastings

Subscribed and sworn to before me this 21st day of November, 2013.



Notary Public 

My commission expires: 4/10/2017