

February 19, 2014

Attention: Robert Hardies  
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:  
EPRI Report MRP-367 (Product # 3002000647), Materials Reliability Program:  
Evaluation of the Reactor Vessel Beltline Shell Forgings of Operating U.S. PWRs  
for Quasi-Lainar Indications, November 2013

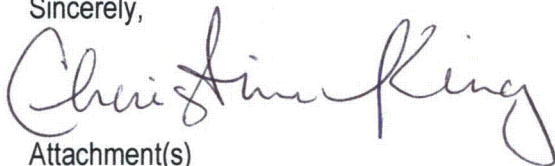
To Whom It May Concern:

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. (A second copy of the report, suitably edited and annotated for release to/inclusion in the Public Document Room is also being provided.)

EPRI desires to disclose the Report in confidence to assist the NRC staff in its work with the industry in managing light water reactor (LWR) materials aging issues. 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) 855-2164. Questions on the content of the Report should be directed to Tim Hardin of EPRI at (650) 855-8776.

Sincerely,



Attachment(s)

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

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NR

## AFFIDAVIT

RE: Request for Withholding of the Following Commercial Document:

EPRI Report MRP-367 (Product # 3002000647), Materials Reliability Program: Evaluation of the Reactor Vessel Beltline Shell Forgings of Operating U.S. PWRs for Quasi-Laminar Indications, November 2013

I, Christine King, being duly sworn, depose and state as follows:

I am a Technical Director at the 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 Privileged and Confidential Information is identified by a solid vertical line in the margin adjacent to the material and a notation at the head of each page containing such material.

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 3420 Hillview Avenue being the premises and place of business of Electric Power Research Institute, Inc.

Date: 2/19/14

Christine King  
Christine King

(State of California)  
(County of Santa Clara)

*(see attached)*

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

Signature \_\_\_\_\_ (Seal)

My Commission Expires \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

# CALIFORNIA JURAT WITH AFFIANT STATEMENT

- See Attached Document (Notary to cross out lines 1-6 below)  
 See Statement Below (Lines 1-5 to be completed only by document signer[s], *not* Notary)

1 \_\_\_\_\_  
 2 \_\_\_\_\_  
 3 \_\_\_\_\_  
 4 \_\_\_\_\_  
 5 \_\_\_\_\_  
 6 \_\_\_\_\_

Signature of Document Signer No. 1 \_\_\_\_\_ Signature of Document Signer No. 2 (if any) \_\_\_\_\_

State of California  
 County of Santa Clara

Subscribed and sworn to (or affirmed) before me on this  
19th day of February, 2014, by  
Date Month Year

(1) Christina King,  
Name of Signer

proved to me on the basis of satisfactory evidence  
 be the person who appeared before me (.)

(and)  
 (2) \_\_\_\_\_,  
Name of Signer

proved to me on the basis of satisfactory evidence  
 be the person who appeared before me.)

Signature Kathy Syler  
Signature of Notary Public



Place Notary Seal Above

## OPTIONAL

*Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.*

### Further Description of Any Attached Document

Title or Type of Document: AFFIDAVIT - REQ FOR WITH. DDC-EPRI FOR MRP - 367

Document Date: 2/19/14 Number of Pages: 2

Signer(s) Other Than Named Above: N/A

