



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 28, 2016

Mr. Edward D. Halpin
Senior Vice President, Generation
and Chief Nuclear Officer
Pacific Gas and Electric Company
Diablo Canyon Power Plant
P.O. Box 56, Mail Code 104/6
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON POWER PLANT, UNITS 1 AND 2 - REQUEST FOR
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE (CAC
NOS. ME7522 AND ME7523)

Dear Mr. Halpin:

By letter dated May 30, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML131540159), Pacific Gas and Electric (PG&E) submitted a response to a request for information. The response included an affidavit executed by Mr. Scott Roberts, President, CS Innovations, LLC, dated April 25, 2013 (AFF6116-00053-5), requesting that information contained in the following documents be withheld from public disclosure pursuant to the Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

- CS Innovations document 6002-10202, Revision 3, "ALS [Advanced Logic System], ALS-102 Design Specification," dated December 14, 2013 (Proprietary)
- CS Innovations document 6002-10206, Revision 1, "ALS-102 FPGA [Field Programmable Gate Array] Design Specification," dated August 23, 2012 (Proprietary)
- CS Innovations document 6116-00100, Revision A, "Diablo Canyon Units 1 and 2 Process Protection System ALS-ASU [ALS Service Unit] Communication Protocol," August 2012 (Proprietary)
- CS Innovations document 6116-00000, Revision 4, "Diablo Canyon PPS [Process Protection System] Management Plan," April 2013 (Proprietary)
- CS Innovations document 6116-00003, Revision 2, "Diablo Canyon PPS VV [Verification and Validation] Plan," May 2013 (Proprietary)

Due to the extent of proprietary information contained in these documents, CS Innovations, LLC was not required to submit non-proprietary versions.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of CS Innovations' competitors without license from CS Innovations constitutes a competitive economic advantage over other companies.
- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of CS Innovations, its customers or suppliers.
- (e) It reveals aspects of past, present, or future CS Innovations or customer funded development plans and programs of potential commercial value to CS Innovations.
- (f) It contains patentable ideas, for which patent protection may be desirable.

We have reviewed your submittal in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

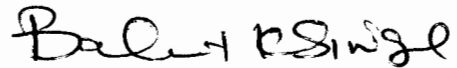
If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the U.S. Nuclear Regulatory Commission (NRC). You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

E. Halpin

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If you have any questions regarding this matter, I may be reached at 301-415-3016.

Sincerely,

A handwritten signature in black ink that reads "Balwant K. Singal". The signature is written in a cursive, slightly slanted style.

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

cc: Mr. Scott Roberts, President
CS Innovations, LLC
7400 E. Tierra Buena Lane, Suite 101
Scottsdale, AZ 85260-1795

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E. Halpin

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If you have any questions regarding this matter, I may be reached at 301-415-3016.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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