



Limited Liability Company
«RESEARCH AND PRODUCTION COMPANY RADICS»

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Ref. № 112019/20

Dated: November 29, 2019

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mr. Joseph Holonich
Senior Project Manager
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

99902032

Subject: Pre-Application Meeting for RadICS Digital I&C Platform Topical Report Supplement

References: (1) Research and Production Corporation Radics LLC letter to NRC dated August 16, 2019, "Submittal of -A Version of RadICS Digital I&C Platform Topical Report" (ADAMS Accession No. ML19233A177)

Radics LLC requests a public meeting with the NRC technical staff to discuss a planned supplement to the RadICS Digital I&C Platform Topical Report that was provided in Reference 1. This meeting is considered a Phase 0 meeting, as described in DI&C-ISG-06, "Licensing Process." Radics LLC is submitting the enclosed information to support the meeting. As discussed with the NRC, some of the material to be presented is considered proprietary:

Radics LLC requests that the proprietary document be withheld from public disclosure. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," an affidavit is enclosed identifying the specific portions of the above documents that are proprietary and the basis for making that determination. Non-proprietary versions of the documents are also provided with the proprietary information redacted.

Enclosure 1 provides the proprietary presentation material for the closed meeting.

Enclosure 2 provides the non-proprietary version of the presentation material.

Enclosure 3 provides an affidavit related to the proprietary material in Enclosure 1.

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If you have any questions related to this submittal, please contact me at 423-834-4455 or by e-mail at mjburzynski@newcleardayinc.com.

Sincerely,

A handwritten signature in black ink that reads "Mark J. Burzynski". The signature is written in a cursive, flowing style.

Mark J. Burzynski
US Licensing Manager
RPC Radics LLC

Enclosure 3

Withholding Affidavit Related to the Proprietary Material in Enclosure 1

Affidavit

STATE OF TENNESSEE)

)

COUNTY OF HAMILTON)

1. I, Mark Burzynski (RPC Radics LLC US Licensing Manager), am familiar with the criteria applied by RPC Radics LLC to determine whether certain RPC Radics LLC information is proprietary. I am familiar with the policies established by RPC Radics LLC to ensure the proper application of these criteria.
2. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," Research and Production Corporation Radics (hereafter called RPC Radics LLC) requests withholding from public disclosure of the documents listed in attached Table 1, which is attached to this affidavit. The documents contain application, product design details, and qualification process information related to the RadICS digital instrumentation and controls platform. RPC Radics LLC has expended a significant amount of money and effort involving numerous contractors over more than 5 years to develop this product.
3. As required by 10 CFR 2.390, RPC Radics LLC has included in attached Table 1 the following information:
 - Identity of the document or part sought to be withheld;

- Declaration of the basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a);
 - Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public; and
 - Locations in the documents of all information sought to be withheld.
4. As required in § 2.390(b)(4), RPC Radics LLC wishes to note that the request for withholding from public disclosure applies to pages that contain commercially sensitive information that RPC Radics LLC normally discloses only under a Non-Disclosure Agreement (NDA). This commercially sensitive information is not available in public sources and is the type of information customarily held in confidence by RPC Radics LLC and our competitors. Some examples of categories of information which fit into the definition of proprietary information are:
- a) Information which discloses process, method, or apparatus, including supporting data and analyses, where prevention of its use by competitors of RPC Radics LLC without license or contract from RPC Radics LLC constitutes a competitive, economic advantage over other companies in the industry.
 - b) Information, which if used by competitors, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, application, installation, assurance of quality, or licensing of a similar-product.

- c) Information which reveals cost or price information, production capacities, budget levels, or commercial strategies of RPC Radics LLC, its customers, its partners, or, its suppliers.
 - d) Information which reveals aspects of past, present, or future RPC Radics LLC customer-funded development plans or programs, of potential commercial value to RPC Radics LLC.
 - e) Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.
 - f) Information obtained through RPC Radics LLC actions which could reveal, additional insights into nuclear equipment qualification processes, customer applications, and regulatory proceedings, and which are not otherwise readily obtainable by a competitor.
5. RPC Radics LLC is transmitting this information to NRC in confidence.
6. As noted in attached Table 1, release of this information in a public forum could cause harm to RPC Radics LLC by revealing trade secrets and/or commercially sensitive design and operational details and technical processes related to designing, building, and/or operating a RadICS digital safety instrumentation and control system.
7. As RPC Radics LLC US Licensing Manager, I have been specifically delegated responsibility for reviewing the information sought to be withheld, and I am authorized to apply for its withholding on behalf of RPC Radics LLC.



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8. The foregoing statements are true and correct to the best of my knowledge,
information, and belief.

Mark J. Burzynski

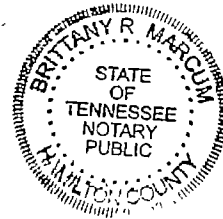
US Licensing Manager

RPC Radics LLC

Sworn to and subscribed before me

this 29th day of November, 2019

Notary Public



My commission expires: November 16, 2022

Table 1. Documents requested for withholding from public disclosure

Document Title	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public
Presentation Titled "RadICS Topical Report Supplement Plans"	Portions of presentation slides 4, 7, 8, 9, 10, 11, and 18 marked by brackets ().	Trade secrets and / or commercial information as per § 2.390(a)(4)	Radics LLC would be harmed by disclosure of commercially sensitive details of how the generic hardware and software components of a RadICS system work, and how functions such as data communications and automated self-diagnostics are implemented. This would be of value to a competitor in understanding specific competitive design and operational characteristics of RadICS systems. Radics LLC would be harmed by disclosure of aspects of the identified commercially sensitive information that, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the licensing of a similar product