

PROJ 0669
99902021

Ref. EPRI Project Number 669

March 2, 2021

U.S. Nuclear Regulatory Commission
Attention: Andrew Johnson
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: Request for Withholding of the Following Commercial Document:
Steam Generator Management Program: Extended Inspection Interval Analyses of
Axial ODSCC at Tube Support Plate Intersections on High Residual Stress Tubes
for Steam Generators with Alloy 600TT Tubing, December 2020. 3002019984

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) 595-2004. Questions on the content of the Report should be directed to Helen Cothron of EPRI at (865) 773-4403.

Sincerely,



Attachment(s)

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

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NRR

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AFFIDAVIT

RE: Request for Withholding of the Following Commercial Document:
Steam Generator Management Program: Extended Inspection Interval
Analyses of Axial ODSCC at Tube Support Plate Intersections on High
Residual Stress Tubes for Steam Generators with Alloy 600TT Tubing,
December 2020. 3002019984

I, Rita Baranwal, being duly sworn, depose and state as follows:

I am the Nuclear Vice President of Execution & Strategy 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, Charlotte, NC being the premises and place of business of Electric Power Research Institute, Inc.

Date: 3/3/2021

[Signature]
Dr. Rita Baranwal

(State of North Carolina)
(County of Mecklenburg)

Subscribed and sworn to (or affirmed) before me on this 3 day of March, 2021 by Rita Baranwal, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature [Signature]

My Commission Expires 12 day of August, 2023

