



ConstellationSM

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10 CFR 50.55a

January 11, 2024

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Subject: Proposed Alternative to the Requirements for Repair/Replacement of
Saltwater (SW) System Buried Piping

- References:
- 1) "Calvert Cliffs Nuclear Power Plant, Units 1 and 2 - Summary of January 10, 2022, Closed Meeting with Exelon Generation Company, LLC RE: Proposed Relief Request for Alternative Repair of Buried Saltwater Piping with Carbon Fiber Reinforced Polymer Composite System (EPID L-2021-LRM-0122)," dated March 22, 2022 (ML22066A001)
 - 2) Letter from D. Helker (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "Proposed Alternative to the Requirements for Repair/Replacement of Saltwater (SW) System Buried Piping," dated February 24, 2023 (ML23055A284)
 - 3) Letter from S. Goetz (U.S. Nuclear Regulatory Commission) to D. Rhoades (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "Calvert Cliffs Nuclear Power Plant, Units 1 and 2 - Request for Additional Information Regarding Proposed Alternative to the Requirements for Repair/Replacement of Saltwater System Buried Piping (EPID: L-2023-LLR-0006)," dated August 16, 2023 (ML23219A163)
 - 4) Letter from D. Helker (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information - Proposed Alternative to the Requirements for Repair/Replacement of Saltwater (SW) System Buried Piping," dated August 29, 2023 (ML23241A841)

**Attachment 1 transmitted herewith contains Proprietary Information.
When separated from Attachment 1, this document is decontrolled.**

- 5) "Summary of December 11, 2023, Meeting with Constellation on Alternative Request Involving Carbon Fiber Reinforced Polymer Composite (EPID L-2023-LLR-0006)," dated January 9, 2024 (ML23326A152)

In accordance with the provisions of 10 CFR 50.55a(z)(1), Constellation Energy Generation, LLC, (CEG) requested approval to allow the use of the V-Wrap™ Carbon Fiber Reinforced Polymer (CFRP) Composite System for the internal repair of the buried Saltwater (SW) System piping at Calvert Cliffs Nuclear Power Plant (CCNPP), Units 1 and 2 in the Reference 2 letter. Attachment 1 contains an updated Enclosure 5, Attachment C (Proprietary Version).

Attachment 1 contains proprietary information. Structural Group, Inc. requests that this information be withheld from public disclosure in accordance with 10 CFR 2.390. An affidavit supporting this request is contained in Attachment 2.

There are no regulatory commitments contained in this letter.

If you have any questions, please contact Jesse Brown at jesse.brown@constellation.com.

Respectfully,



David P. Helker
Senior Manager - Licensing
Constellation Energy Generation, LLC

Attachment: 1) Updated Enclosure 5, Attachment C – Proprietary Version
2) Affidavit

cc: Regional Administrator, NRC Region I
NRC Senior Resident Inspector
NRC Project Manager
S. Seaman, State of Maryland – Attachment 2

Attachment 2

Affidavit



U. S. Nuclear Regulatory Commission Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

RE: Application for Withholding Proprietary Information from Public Disclosure

Ladies and Gentlemen:

Structural Group, Inc. (SGI), has provided certain proprietary information for Calvert Cliffs Nuclear Power Plant (CCNPP) Units 1 and 2 in connection with a request by Constellation Energy Generation, LLC (CEG) for authorization from the U. S. Nuclear Regulatory Commission (USNRC) to use an alternative to the requirements of American Society of Mechanical Engineers (ASME), Boiler & Pressure Vessel Code, Section XI, IWA-4221(b), pursuant to 10 CFR 50.55a(z)(1). This application requests that SGI proprietary information be protected from public disclosure. The proprietary information for which withholding is being requested in the reference is further identified in the attached affidavit signed by the owner of the proprietary information, SGI, on behalf of itself and any wholly-owned subsidiaries or affiliated companies. An affidavit accompanies this letter, setting forth the basis on which the information may be withheld from public disclosure by the USNRC and addressing with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390 (Reference 5) of the USNRC regulations.

A request for withholding proprietary information has been previously approved by the USNRC for the referenced letter noted below. Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Constellation Energy Group, LLC (CEG). Correspondence with respect to the proprietary aspects of the Application or the Affidavit should reference this letter and be addressed to Richard Hill, General Counsel & Secretary, Structural Group, Inc., 10150 Old Columbia Road, Columbia, MD 21046.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard Hill", written in a cursive style.

Richard Hill
General Counsel & Secretary
rhill@structuralgroup.com
410.859.6473

REFERENCES:

1. Letter from D. Helker (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "Proposed Alternative to the Requirements for Repair/Replacement of Saltwater (SW) System Buried Piping," dated February 24, 2023 (ML23055A284)
2. 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

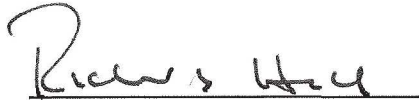
Structural Group, Inc.
10150 Old Columbia Road
Columbia, MD 21046

AFFIDAVIT

State of Maryland)

County of Howard)

Before me, the undersigned authority, personally appeared Richard Hill, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Structural Group, Inc. and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief.



Richard Hill
General Counsel & Secretary

Sworn to and subscribed before me this 9th day of January, 2024



Notary Public



I, Richard Hill, am General Counsel and Secretary of Structural Group, Inc. (SGI). In that capacity I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in conjunction with nuclear plant licensing and rulemaking proceedings and am authorized to apply for its withholding on behalf of SGI, any wholly owned subsidiaries or affiliated companies.

I am making this Affidavit in conformance with the provisions of 10 CFR 2.390 of the U. S. Nuclear Regulatory Commission (USNRC) regulations and in conjunction with SGI's Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.

I have personal knowledge of the criteria and procedures utilized by SGI in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b)(4) of 10 CFR 2.390 of the USNRC regulations, the following is furnished for consideration by the USNRC in determining whether the information sought to be withheld from public disclosure should be withheld.

The information sought to be withheld from public disclosure is owned by and has been held in confidence by SGI. The Constellation Energy Group, LLC submittal which contains SGI proprietary information is included in Enclosure 5, "Design", Attachment C, "Sample Calculations".

The information is of a type customarily held in confidence by SGI and not disclosed to the public. SGI has a rational basis for determining the types of information customarily held in confidence by it and utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system provides a rational basis for maintaining confidentiality and justifies the USNRC withholding the information from public disclosure.

Under SGI's system information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

1. The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by a competitor of SGI without license constitutes a competitive advantage over other companies.
2. 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.
3. Its use by a competitor would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
4. It reveals cost or price information, production capacities, budget levels, or commercial strategies of SGI, their customers, or suppliers.
5. It reveals aspects of past, present, or future development plans funded by SGI or its customer, and programs of potential commercial value to SGI.

6. It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the SGI system which include the following:

1. The use of such information by SGI gives it a competitive advantage over competitors. It is, therefore, withheld from disclosure to protect SGI's competitive position.
2. It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes SGI's ability to sell products and services involving the use of the information.
3. Use by a competitor would put SGI at a competitive disadvantage by reducing the competitor's expenditure of resources and capital.
4. Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire process, thereby depriving SGI of its competitive advantage.
5. Unrestricted disclosure would jeopardize the position of prominence of SGI in the world marketplace, and thereby give a market advantage to competitor in those countries in which SGI operates.
6. SGI's capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.

The information is being transmitted to the USNRC in confidence and, under the provisions of 10 CFR 2.390, it is to be received in confidence by the USNRC. The information sought to be protected is not available in public sources and, to the best of our knowledge and belief, available information has not been previously employed in the same original manner or method.

The proprietary information sought to be withheld in this submittal is that which is included as Enclosure 5, "Design", Attachment C, "Sample Calculations" in the letter to the USNRC from the Calvert Cliffs Nuclear Power Plant (CCNPP) titled "Proposed Alternative to the Requirements for Repair/Replacement of Saltwater (SW) System Buried Piping" and reflected in SGI's Application for Withholding Proprietary Information from Public Disclosure addressed to the USNRC Document Control Desk. The proprietary information as submitted by SGI may be used only for that purpose.

This information is required to provide input and licensing support to Constellation Energy Group, LLC. to provide to the USNRC for review of the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, 10CFR50.46 submittal letter from D. Helker (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "Proposed Alternative to the Requirements for Repair/Replacement of Saltwater (SW) System Buried Piping," dated February 24, 2023 (ML23055A284). SGI owns or is permitted to use the proprietary information referenced in this Affidavit under agreements that include Constellation Energy Group, LLC, LLC maintaining the confidentiality of such information, as contemplated in this Affidavit.

Further this information has substantial commercial value as follows:

1. The SGI plan to sell the use of this information to their customers for the purpose of installing the V-Wrap™ Carbon Fiber Reinforced Polymer (CFRP) Composite System in safety related piping.
2. That SGI can self-support and defense of the technology to their customers in the licensing process.
3. The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by SGI.
4. Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of SGI because it would enhance the ability of competitors to provide similar licensing services for commercial power reactors without commensurate expenses.
5. Public disclosure of the information would enable others to use the information to meet USNRC requirements for licensing documentation without purchasing the right to use the information.
6. The development of the technology described in part by the proprietary information is the result of applying the results of many years of experience in an intensive effort by SGI and the expenditure of a considerable sum of money and resources. In order for competitors to duplicate this information, similar technical programs would have to be performed including a significant expenditure money and resources.

Further the deponent sayeth not.