



STEVE SWILLEY
Vice President and
Chief Nuclear Officer

Ref. EPRI Project Number 669

June 4, 2025

Attention: Andrew Johnson
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 Documents:

- Noise Monitoring for Alloy 690TT Steam Generators, 3002029284, August 2022
- Steam Generator Management Program: Steam Generator Deposit Characterization to Address Tube Wear Issues, 3002029280, December 2024
- Program on Technology Innovation: Thermal-Hydraulic Condition Investigation in Steam Generator with Helical Coil Tubes and Comparison with Recirculating and Once-Through Steam Generators, 3002029379, December 2024
- Steam Generator Management Program: Methods for Estimating Steam Generator Tube Support Plate Blockage, 3002029289, December 2024
- Steam Generator Management Program: Eddy Current Examination Technique Specification Sheet Equivalency Study for Alloy 800 SG Tubing, 3002029281, December 2024

Dear Andrew Johnson:

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 "Reports"). Copies of the Reports and the Affidavit in support of this request are enclosed.

EPRI desires to disclose the Reports in confidence as a means of exchanging technical information with the NRC. The Reports are not to be divulged to anyone outside of the NRC nor shall any copies be made of the Reports provided herein. EPRI welcomes any discussions and/or questions relating to the information enclosed. In case the NRC rejects this affidavit for protection for any reason, EPRI requests that the NRC contact the EPRI project manager and EPRI Order Center (vvaughn@epri.com) with an offer of an opportunity for EPRI to withdraw this submittal.

If you have any questions about the legal aspects of this request for withholding, please do not hesitate to contact me. Questions on the content of the Reports should be directed to Helen Cothron of EPRI at 865-773-4033.

Sincerely,

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

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AFFIDAVIT

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Steam Generator Management Program: Eddy Current Examination Technique Specification Sheet Equivalency Study for Alloy 800 SG Tubing, 3002029281, December 2024

I, Steve Swilley, being duly sworn, depose and state as follows:

I am the Vice President and Chief Nuclear Officer 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 Reports that are sought under this Affidavit to be withheld (the "Reports"). I am authorized to apply to the U.S. Nuclear Regulatory Commission ("NRC") for the withholding of the Reports on behalf of EPRI.

EPRI requests that the Reports 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 Reports are owned by EPRI and constitute commercial information that has not been placed in the public domain by EPRI.

b. EPRI made a substantial economic investment to develop the Reports and, by prohibiting public disclosure, EPRI derives an economic benefit in the form of fees charged for the sale of the Reports. The Reports are entitled to the protection of the United States copyright laws. If the Reports were 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 Reports for their own commercial benefit and profit and without expending substantial economic resources required of EPRI to develop the Reports.

c. EPRI made a substantial investment of both money and employee hours over an extended period of time in the development of the Reports. As a result of such effort and cost, both in terms of dollars spent and dedicated employee time, the Reports are highly valuable to EPRI.

d. A public disclosure of the Reports would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to sell the Reports both domestically and internationally. If a party does not purchase the Reports from EPRI, it would require an investment of money, time, and effort equivalent to that expended by EPRI for the party to duplicate the Reports.

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 the laws of the State of North Carolina.

Executed at 1300 W WT Harris Blvd, Charlotte, NC being the premises and place of business of Electric Power Research Institute, Inc.

Date: 6/4/2025

ASB
Steve Swilley

(State of North Carolina)
(County of Mecklenburg)

Subscribed and sworn to (or affirmed) before me on this 4 day of June, 2025, by Steve Swilley, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature Candra B Shuff (Seal)

My Commission Expires 22 day of August, 2028

