Southern Nuclear

Regulatory Affairs

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WITHHOLD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390
(DECONTROLLED UPON REMOVAL OF ATTACHMENT 2)

July 15, 2026

Docket Nos.: 50-321
50-366

NL-26-0269

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

Edwin I. Hatch Nuclear Plant – Units 1 and 2
Response to Request for Additional Information Regarding
Request for Alternative HNP-ISI-ALT-06-01
Implementation of BWRVIP Documents in Lieu of Certain B-N-1 and B-N-2 Examinations

Ladies and Gentlemen:

By letter dated March 23, 2026 [ML26082A171], pursuant to 10 CFR 50.55a(z)(1), Southern Nuclear Operating Company (SNC) requested Nuclear Regulatory Commission (NRC) approval of proposed Alternative HNP-ISI-ALT-06-01 to allow alternative examination methods for certain American Society of Mechanical Engineers (ASME) Code Section XI Class 1 components at the Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2.

By email dated June 15, 2026 [ML26177A124], the NRC staff sent SNC a request for additional information (RAI) regarding the aforementioned alternative request. Attachment 1 to this letter provides SNC's response to the RAI (non-proprietary).

Attachment 2 to this letter provides the proprietary version of SNC's response to the RAI. Attachment 2 contains proprietary information and should be withheld from public disclosure under 10 CFR 2.390.

The Enclosure to this letter provides the affidavit for withholding the proprietary information in Attachment 2 to this letter.

This letter contains no regulatory commitments. If you have any questions, please contact Ryan Joyce at 205-992-6468.

Respectfully submitted,

Digitally signed by JAMIEMCO
Date: 2026.07.15 15:41:11 -05'00'

Jamie M. Coleman

Director, Regulatory Affairs
Southern Nuclear Operating Company

JMC/agq/cbg

Attachments:
1. Response to Request for Additional Information (Non-Proprietary)
2. Response to Request for Additional Information (Proprietary) **(Withheld Information)**

Enclosure: Affidavit Requesting Withholding of Electric Power Research Institute, Inc. Proprietary Information

cc: Regional Administrator, Region II
NRR Project Manager – Hatch 1&2
Senior Resident Inspector – Hatch 1&2
R-Type: CHA02.004

Edwin I. Hatch Nuclear Plant – Units 1 and 2

Response to Request for Additional Information Regarding
Request for Alternative HNP-ISI-ALT-06-01
Implementation of BWRVIP Documents in Lieu of Certain B-N-1 and B-N-2 Examinations

Attachment 1 to NL-26-0269

Response to Request for Additional Information (Non-Proprietary)

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By email dated June 15, 2026 [ML26177A124], the NRC staff sent SNC a request for additional information (RAI) regarding the aforementioned alternative request.

This attachment provides SNC's non-proprietary response to the RAI. Each RAI is repeated below in italicized font, followed by SNC's response to each RAI in plain font. The blank space between double brackets (example: [[ ]]) indicates where proprietary information owned by Electric Power Research Institute, Inc. (EPRI) has been omitted per their request to withhold the information from public disclosure per 10 CFR 2.390. The proprietary version of this RAI response is provided in Attachment 2. The EPRI affidavit providing the basis for withholding this proprietary information is provided in the enclosure to this letter.

RAI-01

Table 1 of the submittal indicates for several components, different examination frequencies and/or sample sizes are allowed for hydrogen water chemistry (HWC), including noble metal chemical addition (NMCA) and online noble metal chemistry (OLNC) environment, versus normal water chemistry (NWC) environment. Specifically,

- *For the jet pump riser brace attachment welds classified under ASME Table IWB-2500-1 Item Number B13.20, BWRVIP-48, Revision 2, allows a reduced examination sample size of 25% for HWC versus 100% for NWC.*
- *For the shroud support (Weld H9) including gussets at HNP-1 classified under ASME Table IWB-2500-1 Item Number B.13.30, BWRVIP-38, Revision 1, allows a longer periodicity of 12 years for enhanced visual examination (EVT-1) and 20 years for ultrasonic testing (UT) for HWC/NMCA/OLNC, versus a maximum of 6 years for EVT-1 and 10 years for UT for NWC.*

The licensee's submittal does not describe the criteria for effective HWC/NMCA/OLNC. The staff cannot access [sic] the sufficiency of the proposed alternative examinations of the jet pump riser brace attachment weld and shroud support weld without additional information concerning the criteria for effective HWC/NMCA/OLNC, and whether HNP-1 and HNP-2 would meet these criteria.

1. *Please discuss if the licensee will (a) apply the examination frequency based on NWC or HWC for the jet pump riser brace welds at HNP-1 and HNP-2, and (b) apply the examination frequency based on NWC or HWC/NMCA/OLNC for the core shroud support weld H9 at HNP-1?*
2. *Please discuss if the licensee plans to apply the examination frequencies for HWC or HWC/NMCA/OLNC and provide the criteria for effective HWC or HWC/NMCA/OLNC that would allow the modified examination frequencies and sample sizes to be applied.*

3. *Please discuss if the criteria described in the response to Item 2 are not met for the entire examination interval, will the examination requirements for NWC be used to inspect the jet pump riser brace welds and core shroud support weld?*

SNC Response to RAI-01

Question 1 Response

Southern Nuclear Operating Company (SNC) intends to apply the inspection sample sizes and examination intervals associated with (a) HWC for the jet pump riser brace welds at HNP-1 and HNP-2, and (b) HWC/NMCA/OLNC for the core shroud support weld H9 at HNP-1. Hatch Units 1 and 2 operate with Online NobleChem (OLNC) and Hydrogen Water Chemistry (HWC), and Hatch performs all necessary actions and analyses to ensure mitigation is maintained at all locations for which mitigation credit is applied. SNC intends to apply reduced examination requirements contained in BWRVIP-48, Revision 2 and BWRVIP-38, Revision 1 only when the BWRVIP-62, Revision 2 criteria for effective implementation of OLNC+HWC are satisfied.

Question 2 Response

BWRVIP-62, Revision 2 provides the implementation requirements necessary to claim inspection relief for BWR internal components based on mitigation of intergranular stress corrosion cracking (IGSCC) through hydrogen water chemistry and noble metal chemistry. An assessment is provided below as to how HNP-1 and HNP-2 meet the requirements in BWRVIP-62, Revision 2 for Category 3a noble metal plants utilizing NMCA+HWC or OLNC+HWC. The specific requirements of BWRVIP-62, Revision 2, are noted in bold and details of how HNP-1 and HNP-2 meet each requirement follow.

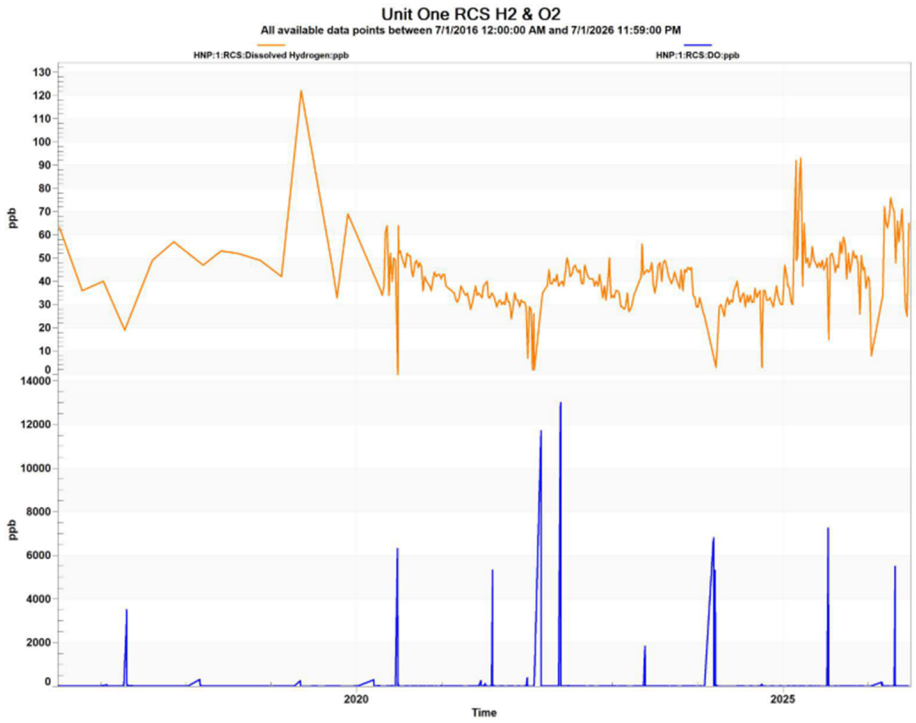
[[ ]] The tables below show HNP-1 and HNP-2 HWC availability over the past ~10 years and demonstrate that availability has been maintained greater than [[ ]].

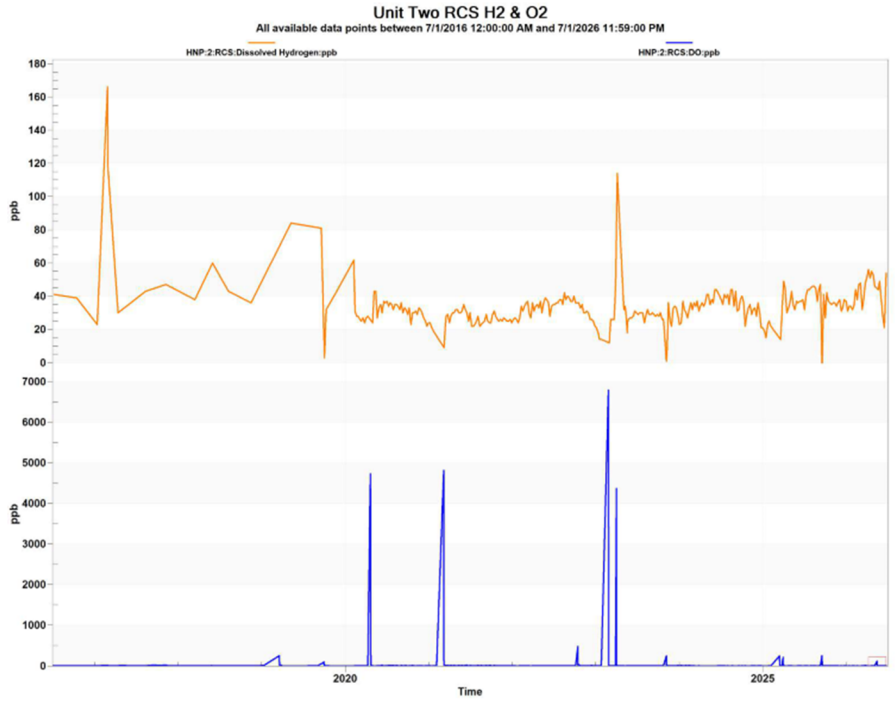
- HNP-1 Cycle 29 HWC availability: 98.88%
- HNP-1 Cycle 30 HWC availability: 98.29%
- HNP-1 Cycle 31 HWC availability: 99.53%
- HNP-1 Cycle 32 HWC availability: 99.17%
- HNP-1 Cycle 33 through May 2026 HWC availability: 93.10%
- HNP-2 Cycle 26 HWC availability: 98.81%
- HNP-2 Cycle 27 HWC availability: 99.50%
- HNP-2 Cycle 28 HWC availability: 99.52%

- HNP-2 Cycle 29 through May 2026 HWC availability: 98.34%

[[ ]]

The plots below are taken from the HNP water chemistry database, SampleIQ, and show that, for HNP-1 and HNP-2, the measured reactor coolant hydrogen-to-oxygen molar ratio was greater than [[ ]] and the excess dissolved hydrogen was greater than [[ ]] for the last ~10 years.





[[ ]]

Initial OLNC application occurred July 13-23, 2010 for HNP-1 and has been re-applied according to OEM recommendations: Aug 2011, Sept 2012, Aug 2013, June 2014, May 2015, May 2016, May 2017, May 2018, May 2019, June 2020, May 2021, June 2022, June 2023, June 2024 and Aug 2025.

Initial OLNC application for HNP-2 occurred Nov. 9-18, 2011 and has been re-applied in accordance with OEM recommendations in: Sept 2012, Aug 2013, June 2014, June 2015, May 2016, May 2017, July 2018, Aug 2019, May 2020, Sep 2022, Sep 2023, Sep 2024 and July 2025.

[[ ]]

HNP-1 and HNP-2 utilize fuel channel fastener scrapings to measure catalyst loading to verify that adequate surface loading criteria is met by the application strategy. The following tables show the results of these scrapings and demonstrate that the requirement to maintain a noble metal loading greater than or equal to [[ ]] µg/cm² has been met for both HNP-1 and HNP-2.

HNP-1 Catalyst Loading Results	
Cycle(s)	Pt Loading (µg/cm^2)
26	0.5
26 & 27	0.6
28	0.5
29 & 30	0.41

HNP-1 Catalyst Loading Results	
Cycle(s)	Pt Loading (µg/cm^2)
29 & 30	0.91
29 & 30	1.16

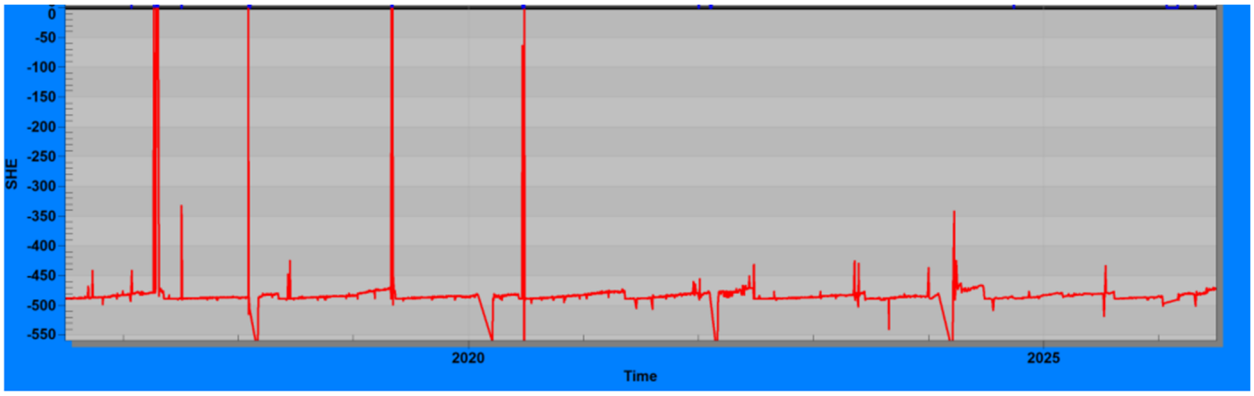
HNP-2 Catalyst Loading Results	
Cycle(s)	Pt Loading (µg/cm^2)
25 & 26	0.27
25 & 26	0.22
25 & 26	0.2

[[ ]]

Direct measurement of the ECP of a stainless steel surface treated during the noble metal application(s) and exposed to reactor coolant at the appropriate flow and temperature. An ECP below [[ ]] indicates that the coolant molar ratio is [[ ]], which corresponds to excess dissolved hydrogen [[ ]]. The plots below show that ECP at HNP-1 and HNP-2 was below [[ ]] during the last ~10 years of operation.

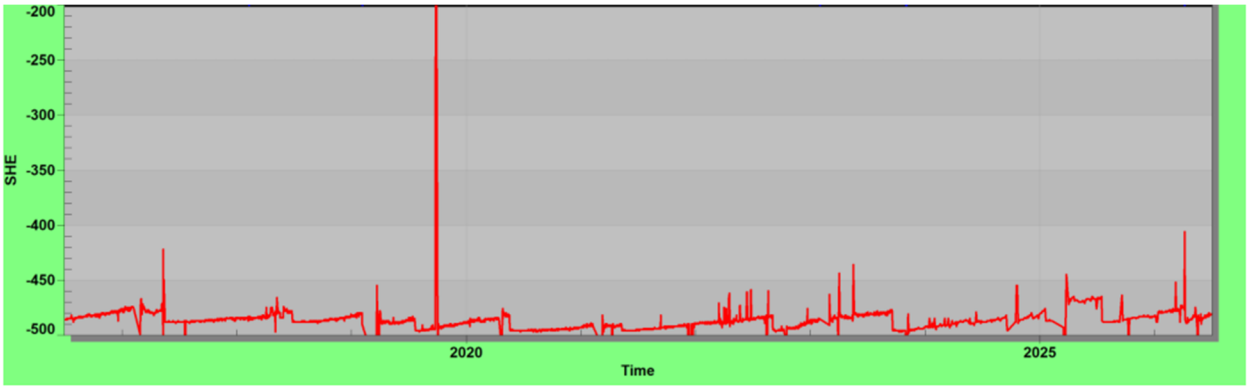
Unit One ECP

All available data points between 7/1/2016 and 7/1/2026



Unit Two ECP

All available data points between 7/1/2016 and 7/1/2026

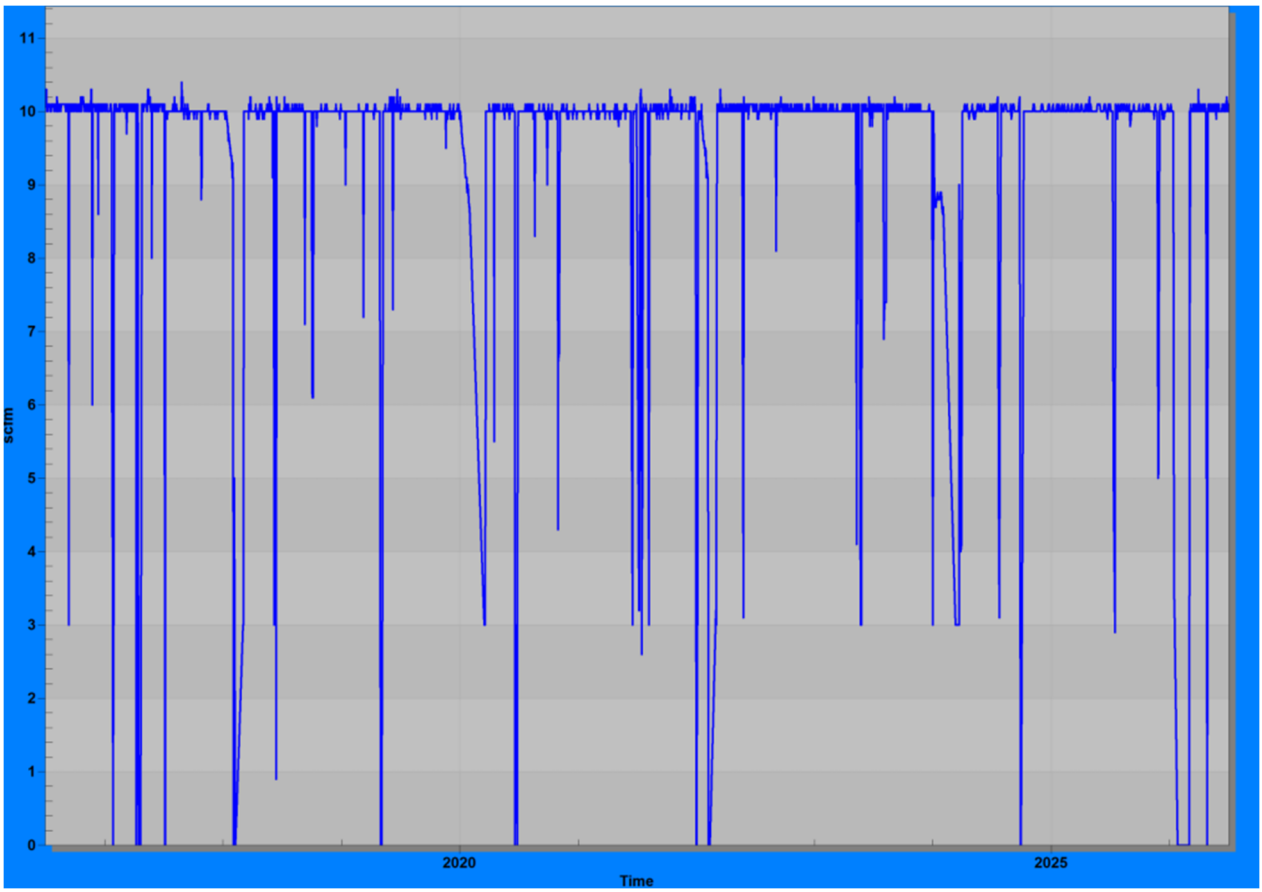


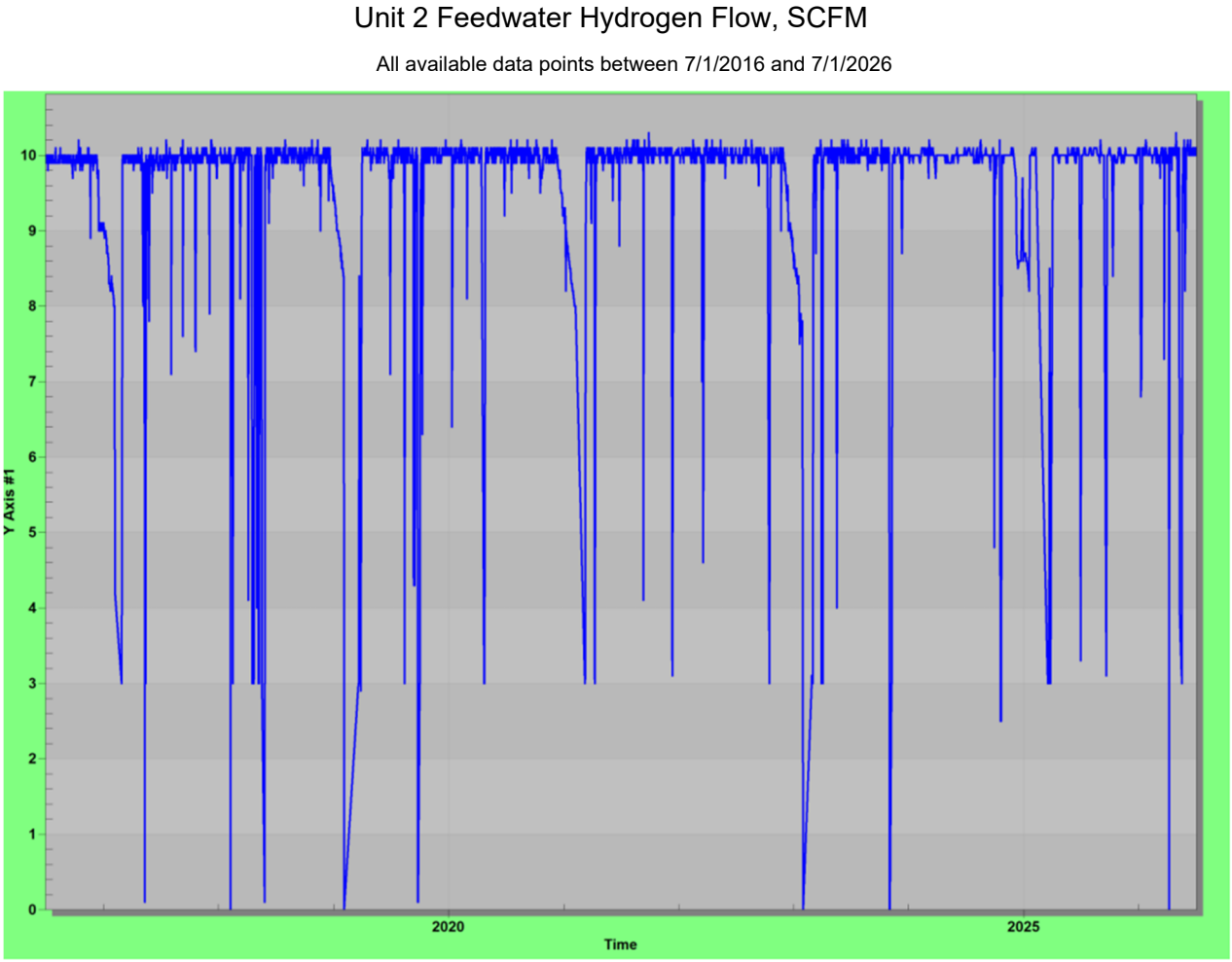
[[ ]]

HNP-1 and HNP-2 have at least two benchmarked secondary chemistry parameters that are available and monitored. 1) Feedwater hydrogen flow rate or concentration, and 2) reactor water H_2:O_2 molar ratio or excess hydrogen concentration from radiolysis model, are presented on the following page.

Unit 1 Feedwater Hydrogen Flow, SCFM

All available data points between 7/1/2016 and 7/1/2026





The BWRVIA computer model calculations were performed for Unit 1 Cycle 32 under the following conditions:

- Beginning of Cycle (BOC)
- Middle of Cycle (MOC)
- End of Cycle (EOC)
- EOC at 105% Core Flow operating in coast down conditions to 80% power.

At the recommended hydrogen injection flow rates (10 SCFM at 100%), model calculations indicate Molar Ratios greater than [[ ]] at all locations except the Mixing Plenum for BOC, MOC, and EOC. Hydrogen injection will need to be increased to 11 SCFM if EOC coast down conditions are expected to maintain a [[ ]] Molar Ratio. Having Molar Ratios greater than [[ ]] is an indication that IGSCC is mitigated in those areas of the reactor vessel or primary system components. Based on this, jet pump and H9 weld locations are mitigated throughout the cycle.

The BWRVIA computer model calculations were performed for Unit 2 Cycle 29 under the following conditions:

- Beginning of Cycle (BOC)
- Middle of Cycle (MOC)
- End of Cycle (EOC)
- EOC at 105% Core Flow operating in coast down conditions to 80% power.

At the recommended hydrogen injection flow rates (10 SCFM at 100%), model calculations indicate Molar Ratios greater than [[ ]] at all locations except the Mixing Plenum for BOC, MOC, and EOC. Having Molar Ratios greater than [[ ]] is an indication that IGSCC is mitigated in those areas of the reactor vessel or primary system components. Based on this, jet pump and H9 weld locations are mitigated throughout the cycle.

[[ ]]

For HNP-1, hydrogen ramp tests have been performed in May 2013 and in May 2023, with no major changes during or since that timeframe.

For HNP-2, hydrogen ramp tests were performed in May 2013 and in May 2023, with no major changes during or since that timeframe.

[[ ]]

The BWRVIA model is run within the first three months of a new fuel cycle and is run for conditions throughout the cycle. The BWR Water Chemistry Guidelines recommends the model be run for BOC, MOC, EOC and end of coast down conditions. The BWRVIA model criterion for effective implementation of NMCA/OLNC in non-monitored locations is a predicted molar ratio of [[ ]]. The BWR Water Chemistry Guidelines recommend the hydrogen injection rate be set to provide a predicted molar ratio by BWRVIA of at least [[ ]] in the upper downcomer. BWRVIA model runs are performed yearly to validate the prediction made at the beginning of the operating cycle. This validation is to be documented in the BWRVIA model results report.

Question 3 Response

If the BWRVIP-62, Revision 2 criteria for effective implementation of OLNC+HWC are not maintained for the period necessary to claim inspection credit, SNC will not apply the HWC/NMCA/OLNC inspection relief provisions. Under those circumstances, the examination sample sizes and frequencies applicable to Normal Water Chemistry (NWC) conditions in the applicable BWRVIP guidance documents would be used for the affected components until the criteria for effective OLNC+HWC implementation are reestablished.

RAI-02

Nuclear Energy Institute (NEI) 03-08, "Guideline for the Management of Materials Issues," Revision 4 (ML20315A536) provides an industry process for determining when an updated industry inspection and evaluation guideline may be implemented by a licensee without NRC prior approval of the guideline. The licensee proposes to use BWRVIP-38, Revision 1, as the basis for proposed alternative examinations of core shroud weld H9 for HNP-1 under Examination Category B-N-2, Item B13.30 and B.13.40 in lieu of applicable ASME Section XI, Examination Category examination. BWRVIP-38, Revision 1 has not been submitted to the NRC staff for review and approval. Based on the licensee's submittal, BWRVIP-38, Revision 1, allows an examination interval that is twice as long for HWC/NMCA/OLNC (12 years for EVT-1, 20 years for UT) compared to the examination interval under NWC (6 years for EVT-1, 10 years for UT).

Provide the plant-specific bases for HNP-1 to apply longer examination intervals to the H9 weld with HWC/NMCA/OLNC.

SNC Response to RAI-02

SNC's basis for applying the HWC/NMCA/OLNC examination intervals contained in BWRVIP-38, Revision 1 for the HNP-1 shroud support weld H9 is based on:

1. Effective implementation of OLNC-assisted HWC (HWC+OLNC) in accordance with BWRVIP-62, Revision 2.
2. The technical basis and inspection experience documented in BWRVIP-38, Revision 1.
3. Plant-specific operating experience demonstrating successful aging management

1. Effective Implementation of HWC+OLNC

Hatch has adopted BWRVIP-190, Revision 2 and utilizes HWC+OLNC to reduce dissolved oxygen concentrations and improve resistance to IGSCC in reactor internal components. Effective implementation of HWC+OLNC for mitigation at Hatch, in accordance with BWRVIP-62, Revision 2, was outlined in SNC's response to RAI-01.

2. Technical Basis and Inspection Experience

BWRVIP-38, Revision 1 was evaluated using the NEI 03-08 Appendix C document-screening process. The screening evaluation concluded that the relative risk associated with implementation of Revision 1 is lower than that associated with Revision 0 due to improved understanding of material behavior, degradation mechanisms, component performance, and industry mitigation practices. The report concludes that BWRVIP-38, Revision 1 may be released for implementation by BWRVIP utilities without NRC approval.

The technical basis of BWRVIP-38, Revision 1 supporting the revised inspection intervals for the shroud support plate is summarized in Section 6 and includes:

- Material susceptibility to SCC (Section 3, Degradation Mechanism and Susceptibility Review)

- Accessibility of the shroud support structure (Section 4, Inspection Accessibility)
- Inspection experience (Section 5, Inspection Experience Summary)
- Component flaw tolerance (Section 7, Flaw Tolerance Calculations and Flaw Evaluation Guidance)

Section 3 of BWRVIP-38, Revision 1 analyzes potential degradation mechanisms for the shroud support and concludes that stress corrosion cracking (SCC) is the only significant degradation mechanism applicable to the shroud support. High cycle fatigue has not been observed in this location in any BWR, and conditions do not exist for other degradation mechanisms such as low cycle fatigue, thermal aging or neutron embrittlement.

Key conclusions of the susceptibility assessment include:

- SCC is the only applicable degradation mechanism for the shroud support structure
- Implementation of effective mitigation significantly reduces the potential for new SCC initiation and significant growth of existing cracks.
- The shroud support structure experiences high sustained stresses during normal operation with the H8 and H9 welds tending to be more highly stressed than the gusset welds. The combined stress state contributing to initiation and growth of circumferentially oriented cracking in the H8 and H9 welds is highest in the regions accessible for inspection.

Section 4 of BWRVIP-38, Revision 1 provides a detailed evaluation of accessibility of the shroud support structure for effective inspections, considering available nondestructive examination (NDE) techniques and the limitations imposed by other vessel internal components. This informs the inspection recommendations of Section 6 and supports the conclusion that the most highly stressed locations of the H9 weld are accessible for inspection.

Section 5 of BWRVIP-38, Revision 1 summarizes industry inspection experience for the shroud support structure, including the H9 weld and gussets. Extensive inspection data reported between 1990 and 2022 is available and was analyzed. No indications have been reported in the H9 welds of plants with “gusset” style shroud support structures, and no indications have been reported in any gusset weld in any plant.

Section 7 of BWRVIP-38, Revision 1 documents the results of stress and fracture mechanics evaluations performed to evaluate the flaw tolerance of the shroud support structure designs. Revision 1 of BWRVIP-38 considers recirculation line break acoustic loads and reduced toughness of the Alloy 182 flux-shielded nickel alloy weld material. These factors were not included in analyses supporting Revision 0. The flaw tolerance of each configuration is used to determine appropriate inspection intervals.

Linear elastic stress analysis of gusset shroud support structures (Appendix B.1.2) was performed, based on a BWR plant with higher loads than HNP-1; therefore, the HNP-1 design is enveloped by the analyses performed for the technical basis for BWRVIP-38, Revision 1. A finite element model was built, and seven different mechanical load cases were applied, with stresses extracted from 100 different paths through the H8 and H9 welds for the flaw tolerance calculations.

A fracture mechanics evaluation of gusset design shroud support structures (Appendix B.2) was performed using a Failure Assessment Diagram (FAD) methodology which integrates Linear Elastic Fracture Mechanics (LEFM), Elastic Plastic Fracture Mechanics (EPFM) and Limit Load (LL) criteria in the same assessment. From this, critical crack sizes were developed, along with allowable crack sizes based on the inspection period. The results allow plant-specific flaw tolerance determination through scaling methodology (Appendix B.3).

Section 6 of BWRVIP-38, Revision 1 provides discussion of examination intervals determined using applicable crack growth rates to determine the appropriate interval for detecting cracks prior to reaching critical crack size. From Section 6.1:

- Inspections performed using EVT-1 and ET will not be able to detect cracking on the far side of the shroud support plate (SSP). Assuming a NWC crack growth rate of [[ ]] inch/hour, through-wall crack growth in these welds could occur in the range of [[ ]]. Because of this limitation, a prudent NWC inspection interval is a maximum of [[ ]]. BWRVIP-59-A and BWRVIP letter 2012-074 recommend a factor of improvement (FOI) of [[ ]] for HWC CGRs, resulting in a constant SCC crack growth rate of [[ ]] inch/hour. More recently, evaluation of Alloy 82 SCC CGRs in BWRVIP-358 concluded that a FOI of [[ ]] was appropriate for HWC operation. Based on these studies, residual lives under HWC operation would be [[ ]] longer than for NWC. Conservatively, shroud support inspection intervals specified for mitigated water chemistry conditions (HWC, NMCA, OLNC) are based on a FOI of [[ ]]. More frequent inspections may be required based on as-found cracking.
- Since UT is a volumetric technique, it is capable of detecting cracking on the far side of the SSP. The additional through-wall interrogation of the material obtained through use of UT allows a significantly more informed characterization of the material condition and a more accurate flaw evaluation, if indications are detected. This increased information justifies a maximum inspection interval of [[ ]] for NWC conditions. Using the same FOI of [[ ]] for operation under mitigated water chemistry conditions results in a HWC inspection interval of [[ ]]. As with inspections performed using EVT-1 or ET, more frequent inspections may be required based on as-found cracking.

3. Plant-Specific Experience

In addition, Hatch plant-specific operating experience supports application of the revised guidance. HNP-1 has performed the required examinations of the H9 weld in accordance with Examination Category B-N-2, Item B13.30 and B.13.40 of ASME Section XI and BWRVIP-38 guidance, as applicable. No indications have been reported from any of these exams in the H9 weld or gussets. The plant-specific experience is therefore consistent with the industry inspection experience and technical bases documented in BWRVIP-38, Revision 1.

Summary

Plant-specific evaluation of the HNP-1 H9 weld, in accordance with the information and methodologies provided in BWRVIP-38, Revision 1, supports use of the HWC/NMCA/OLNC inspection intervals provided that the BWRVIP-62, Revision 2 implementation criteria continue to be satisfied.

The BWRVIP-38, Revision 1 inspection guidance, including the longer examination intervals for the H9 weld, ensures that structural integrity is maintained throughout the inspection interval with adequate margin to detect and evaluate any flaws before they could affect safe operation.

Edwin I. Hatch Nuclear Plant – Units 1 and 2

Response to Request for Additional Information Regarding
Request for Alternative HNP-ISI-ALT-06-01
Implementation of BWRVIP Documents in Lieu of Certain B-N-1 and B-N-2 Examinations

Enclosure to NL-26-0269

Affidavit Requesting Withholding of Electric Power Research Institute, Inc.
Proprietary Information

STEVE SWILLEY
Vice President and
Chief Nuclear Officer

Ref. EPRI Docket No. 99902016

July 8, 2026

Document Control Desk
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Request for Withholding of the following Proprietary Information Included in:

Response to Request for Additional Information Regarding
Request for Alternate HNP-ISI-ALT-06-01, Implementation of
BWRVIP Guidelines in Lieu of Certain B-N-1 and B-N-2 Examinations
Southern Nuclear Operating Company Plant Hatch

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 proprietary information owned by Electric Power Research Institute, Inc. ("EPRI") identified above in the attached document. Proprietary and non-proprietary versions of the RAIs and RAI responses and the Affidavit in support of this request are enclosed.

EPRI desires to disclose the Proprietary Information in confidence to assist the NRC review of the enclosed submittal to the NRC by Southern Nuclear Operating Company. The Proprietary Information is not to be divulged to anyone outside of the NRC or to any of its contractors, nor shall any copies be made of the Proprietary Information 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 Report should be directed to Nathan Palm of EPRI at (724) 288-4043.

Sincerely,

Attachment(s)

1300 West W.T. Harris Boulevard, Charlotte, NC 28262-8550 USA • 704.595.2630 • Mobile 704.562.8135 • sswilley@epri.com

AFFIDAVIT

Subject: Request for Withholding of the Following Proprietary Information Included In:

Response to Request for Additional Information Regarding
Request for Alternate HNP-ISI-ALT-06-01, Implementation of
BWRVIP Guidelines in Lieu of Certain B-N-1 and B-N-2 Examinations
Southern Nuclear Operating Company Plant Hatch

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 Report which contains EPRI Proprietary Information that is sought under this Affidavit to be withheld "Proprietary Information". I am authorized to apply to the U.S. Nuclear Regulatory Commission ("NRC") for the withholding of the Proprietary Information on behalf of EPRI.

EPRI Proprietary Information is identified in the above referenced document with yellow highlighting.

This sentence is an example.

EPRI requests that the Proprietary Information 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 Proprietary Information is owned by EPRI and has been held in confidence by EPRI. All entities accepting copies of the Proprietary Information do so subject to written agreements imposing an obligation upon the recipient to maintain the confidentiality of the Proprietary Information. The Proprietary Information is disclosed only to parties who agree, in writing, to preserve the confidentiality thereof.

b. EPRI considers the Proprietary Information contained therein to constitute trade secrets of EPRI. As such, EPRI holds the information in confidence, and disclosure thereof is strictly limited to individuals and entities who have agreed, in writing, to maintain the confidentiality of the Information. EPRI made a substantial economic investment to develop the Proprietary Information, and, by prohibiting public disclosure, EPRI derives an economic benefit in the form of licensing royalties and other additional fees from the confidential nature of the Proprietary Information. If the Proprietary Information were publicly available to consultants and/or other businesses providing services in the electric and/or nuclear power industry, they would be able to use the Proprietary Information for their own commercial benefit and profit and without expending substantial economic resources required of EPRI to develop the Proprietary Information.

c. EPRI's classification of the Proprietary Information as trade secrets is justified by the Uniform Trade Secrets Act, which California adopted in 1984 and a version of which has been adopted by over forty states. The California Uniform Trade Secrets Act, California Civil Code §§3426 – 3426.11, defines a "trade secret" as follows:

> "Trade secret' means information, including a formula, pattern, compilation, program device, method, technique, or process, that:
>
> (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and
>
> 2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy."

d. The Proprietary Information contained therein are not generally known or available to the public. EPRI developed the Information only after making a determination that the Proprietary Information was not available from public sources. EPRI made a substantial investment of both money and employee hours in the development of the Proprietary Information. EPRI was required to devote these resources and effort to derive the Proprietary Information. As a result of such effort and cost, both in terms of dollars spent and dedicated employee time, the Proprietary Information is highly valuable to EPRI.

e. A public disclosure of the Proprietary Information would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to license the Proprietary Information both domestically and internationally. The Proprietary Information and Report can only be acquired and/or duplicated by others using an equivalent investment of time and effort.

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: July 8, 2026

Steve Swilley

(State of North Carolina)
(County of Mecklenburg)

Subscribed and sworn to (or affirmed) before me on this 8 day of July, 2026 by Steven Swilley, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature _____ (Seal)

My Commission Expires 22 day of August, 2028

CANDRA B SHERIFF
Notary Public
Cabarrus
County
NORTH CAROLINA