

April 20, 2011

Mr. C. E. Carpenter, Jr.
Group Lead for Aging Management Issues
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 Document:

1. EPRI 1019160 – Failure Models and Data Analysis for Nuclear Plant Medium Voltage Cables for Consideration in Preventive Maintenance and Strategic Replacement
2. EPRI 1018777 – Failure Mechanism Assessment of Medium-Voltage Ethylene Propylene Rubber Cables
3. EPRI 1021070 – Medium Voltage Cable Aging Management Guide
4. EPRI 1021069 – Medium Voltage Cable Failure Mechanism Report, Update 1

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 (the "Report"). Proprietary and non-proprietary versions of the Report and the Affidavit in support of this request are enclosed.

EPRI desires to disclose the Report in confidence to assist NRC staff in understanding cable aging management issues. The Report 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 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 650-855-2164. Questions on the content of the Report should be directed to Gary Toman of EPRI at 704-595-2573.

Sincerely,



Christine King
Sr. Manager, Business & Operations

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AFFIDAVIT

RE: Request for Withholding of the Following Proprietary Documents:

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I, Christine King, being duly sworn, depose and state as follows:

I am the Senior Manager of Business & Operations for the Nuclear Power Sector 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 Reports be withheld from the public on the following bases:

Withholding Based Upon Privileged And Confidential Trade Secrets Or Commercial Or Financial Information:

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

b. EPRI considers the Reports and the proprietary information contained therein (the "Proprietary Information") to constitute trade secrets of EPRI. As such, EPRI holds the Reports in confidence and disclosure thereof is strictly limited to individuals and entities who have agreed, in writing, to maintain the confidentiality of the Report. EPRI made a substantial economic investment to develop the Report, 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 Reports. If the Reports and 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 Reports for their own commercial benefit and profit and without expending the substantial economic resources required of EPRI to develop the Reports.

c. EPRI's classification of the Reports and 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."

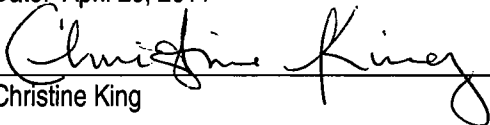
d. The Reports and the Proprietary Information contained therein are not generally known or available to the public. EPRI developed the Reports only after making a determination that the Proprietary Information was not available from public sources. EPRI made a substantial investment of both money and employee hours in the development of the Report. EPRI was required to devote these resources and effort to derive the Proprietary Information and 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.

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 Reports can only be acquired and/or duplicated by others using an equivalent investment of time and effort.

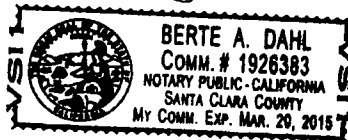
I have read the foregoing and the matters stated herein are true and correct to the best of my knowledge, information and belief. I make this affidavit under penalty of perjury under the laws of the United States of America and under the laws of the State of California.

Executed at 3420 Hillview Avenue being the premises and place of business of Electric Power Research Institute, Inc.

Date: April 20, 2011


Christine King

(State of California)
(County of Santa Clara)



Subscribed and sworn to (or affirmed) before me on this 20 day of April, 2011, by Christine King, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Berthe A. Dahl (Seal)

My Commission Expires 20 day of March, 2011