



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 24, 2012

Mr. Edward D. Halpin
Senior Vice President and
Chief Nuclear Officer
Pacific Gas and Electric Company
Diablo Canyon Power Plant
P.O. Box 56, Mail Code 104/6
Avila Beach, CA 93424

SUBJECT: DIABLO CANYON POWER PLANT, UNITS 1 AND 2 - REQUEST FOR
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE (TAC
NOS. ME7522 AND ME7523)

Dear Mr. Halpin:

By letter dated June 6, 2012 (LTR-DCL-12-050, Agencywide Documents Access and Management System (ADAMS) Accession No. ML121700592), Pacific Gas and Electric (PG&E) submitted additional information to support a license amendment request. This additional information included an affidavit executed by Mr. Scott Roberts, CS Innovations, LLC (a wholly owned subsidiary of Westinghouse Electric Company), dated May 29, 2012 (AFF6116-00053-3), requesting that information contained in the following documents be withheld from public disclosure pursuant to the Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

- CS Innovations document 6116-00059, Rev A, "Diablo Canyon Units 1 & 2 Process Protection System ALS Requirements Traceability Matrix," October 2011 (Proprietary)
- CS Innovations document 6002-00060, Rev 0, "ALS Board Manufacturing Procedures," January 17, 2012 (Proprietary)
- Westinghouse document EQ-TP-251-PGE, Rev 0, "EMC Qualification Test Procedure for the Line Sense Module (LSM) for Diablo Canyon," May 2012 (Proprietary)
- Westinghouse document EQ-TP-253-PGE, Rev 0, "Environmental Qualification Test Procedure for the Line Sense Module (LSM) for Diablo Canyon," May 2012 (Proprietary)
- CS Innovations document 6116-00000, Rev 2, "Diablo Canyon PPS Management Plan," May 11, 2012 (Proprietary)
- CS Innovations document 6116-00500, Rev A, "Diablo Canyon PPS VV Summary Report," May 2012 (Proprietary)

- CS Innovations document 6116-00003, Rev 0, "Diablo Canyon PPS VVPlan," May 2012 (Proprietary)
- CS Innovations document 6116-00005, Rev 1, "Diablo Canyon PPS System Test Plan," May 16, 2012 (Proprietary)
- CS Innovations document 6116-70140, Rev 0, "Diablo Canyon PPS System Test Design Specification," May 2012 (Proprietary)
- CS Innovations document 6116-00029, Rev 1, "Diablo Canyon PPS Reliability and Failure Mode and Effects Analysis" May 2012 (Proprietary)

Due to the extent of proprietary information contained in these documents, CS Innovations, LLC was not required to submit a non-proprietary version.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of CS Innovations' competitors without license from CS Innovations constitutes a competitive economic advantage over other companies.
- (b) 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.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of CS Innovations, its customers or suppliers.
- (e) It reveals aspects of past, present, or future CS Innovations or customer funded development plans and programs of potential commercial value to CS Innovations.
- (f) It contains patentable ideas, for which patent protection may be desirable.

We have reviewed your submittal in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

E. Halpin

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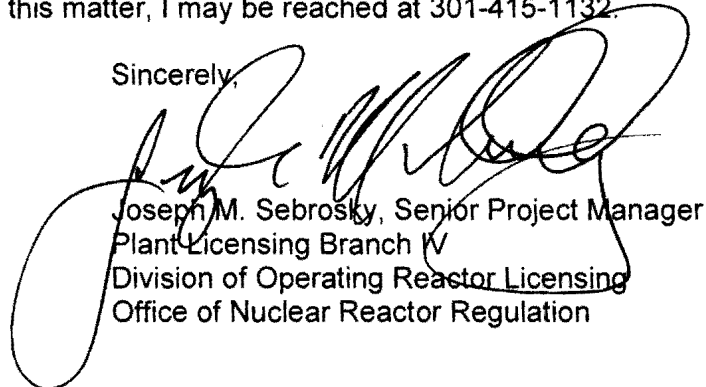
Therefore, the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the U.S. Nuclear Regulatory Commission (NRC). You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-1132.

Sincerely,



Joseph M. Sebrosky, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

cc: Mr. Scott Roberts, Director
CS Innovations, LLC
7400 E. Tierra Buena Lane, Suite 101
Scottsdale, AZ 85260-1795

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/RA/

Joseph M. Sebrosky, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-275 and 50-323

cc: Mr. J. A. Gresham, Manager
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