



Limited Liability Company  
«RESEARCH AND PRODUCTION COMPANY RADICS»

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Ref. № 082018/015

Dated: August 10, 2018

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mr. Joseph Holonich  
Senior Project Manager  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

Subject: Submittal of Phase 2 Documents for RadICS Digital I&C Platform Topical Report  
(Docket Number 99902032)

References: (1) Research and Production Corporation Radics LLC letter to NRC dated September 20, 2016, "Submittal of RadICS Digital I&C Platform Topical Report" (ADAMS Accession No. ML16274A346)  
(2) NRC letter to Research and Production Corporation Radics LLC dated April 15, 2017, "Acceptance Review of "RadICS Digital I&C Platform Topical Report" Submitted September 20, 2016 (CAC NO. MF8411)" (ADAMS Accession No. ML16281A459)

In Reference 1 Research and Production Corporation Radics (RPC Radics LLC) submitted a topical report for the RadICS digital instrumentation and control (I&C) platform. The RadICS Platform is a generic digital safety I&C platform designed to implement Class 1E safety-related applications in United States nuclear power plants. The NRC accepted the RadICS Digital I&C Platform Topical Report for review in Reference 2.

The RPC Radics LLC documents to be submitted in Phase 2 to support the RadICS Topical Report review are identified in RadICS Topical Report Table C-1. The following documents are being submitted in support of the RadICS Topical Report review:

Document Title	Revision Level	Classification
2016-RTS002-EQTSR-040, "Equipment Qualification Test Summary Report"	0	Proprietary
2017-RTS001-CGDSR_AOM-370, "Commercial Grade Dedication Summary Report for AOM"	0	Proprietary
2017-RTS001-CGDSR_LM-371, "Commercial Grade Dedication Summary Report for LM"	0	Proprietary
2017-RTS001-CGDSR_AIM-372, "Commercial Grade Dedication Summary Report for AIM"	0	Proprietary

Y601  
T007  
NRR

Document Title	Revision Level	Classification
2017-RTS001-CGDSR_DIM-373, "Commercial Grade Dedication Summary Report for DIM"	0	Proprietary
2017-RTS001-CGDSR_DOM-374, "Commercial Grade Dedication Summary Report for DOM"	0	Proprietary
2017-RTS001-CGDSR_OCM-375, "Commercial Grade Dedication Summary Report for OCM"	0	Proprietary
2017-RTS001-CGDSR_IOPM-376, "Commercial Grade Dedication Summary Report for IOPM"	0	Proprietary
2017-RTS001-CGDSR_CH-377, "Commercial Grade Dedication Summary Report for CH"	0	Proprietary
2017-RTS001-CGDSR_VM-378, "Commercial Grade Dedication Summary Report for VM"	0	Proprietary

RPC Radics LLC requests that the proprietary documents be withheld from public disclosure. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," an affidavit is enclosed identifying the specific portions of the above documents that are proprietary and the basis for making that determination.

Nonproprietary versions of the RPC Radics LLC documents are not provided based on the guidance in NRC Regulatory Information Summary (RIS) 2014-01. As noted in RIS 2014-01, in instances in which a nonproprietary version would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted.

All documents are submitted by hard copy mail.

Enclosure 1 provides the proprietary version of the RPC Radics LLC documents.

Enclosure 2 provides an affidavit related to the proprietary material in Enclosure 1.

If you have any questions related to this submittal, please contact me at 423-834-4455 or by e-mail at [mjburzynski@newclearadayinc.com](mailto:mjburzynski@newclearadayinc.com).

Sincerely,



Mark J. Burzynski  
US Licensing Manager  
RPC Radics LLC

## Enclosure 2

Withholding Affidavit Related to the Proprietary Material in Enclosure 1

**Affidavit**

STATE OF TENNESSEE            )

)

COUNTY OF HAMILTON         )

1. I, Mark Burzynski (RPC Radics LLC US Licensing Manager), am familiar with the criteria applied by RPC Radics LLC to determine whether certain RPC Radics LLC information is proprietary. I am familiar with the policies established by RPC Radics LLC to ensure the proper application of these criteria.
2. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," Research and Production Corporation Radics (hereafter called RPC Radics LLC) requests withholding from public disclosure of the documents listed in attached Table 1, which is attached to this affidavit. The documents contain application, product design details, and qualification process information related to the RadICS digital instrumentation and controls platform. RPC Radics LLC has expended a significant amount of money and effort involving numerous contractors over more than 5 years to develop this product.
3. As required by 10 CFR 2.390, RPC Radics LLC has included in attached Table 1 the following information:
  - Identity of the document or part sought to be withheld;

- Declaration of the basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a);
  - Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public; and
  - Locations in the documents of all information sought to be withheld.
4. As required in § 2.390(b)(4), RPC Radics LLC wishes to note that the request for withholding from public disclosure applies to pages that contain commercially sensitive information that RPC Radics LLC normally discloses only under a Non-Disclosure Agreement (NDA). This commercially sensitive information is not available in public sources and is the type of information customarily held in confidence by RPC Radics LLC and our competitors. Some examples of categories of information which fit into the definition of proprietary information are:
- a) Information which discloses process, method, or apparatus, including supporting data and analyses, where prevention of its use by competitors of RPC Radics LLC without license or contract from RPC Radics LLC constitutes a competitive, economic advantage over other companies in the industry.
  - b) Information, which if used by competitors, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, application, installation, assurance of quality, or licensing of a similar-product.

- c) Information which reveals cost or price information, production capacities, budget levels, or commercial strategies of RPC Radics LLC, its customers, its partners, or, its suppliers.
  - d) Information which reveals aspects of past, present, or future RPC Radics LLC customer-funded development plans or programs, of potential commercial value to RPC Radics LLC.
  - e) Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.
  - f) Information obtained through RPC Radics LLC actions which could reveal, additional insights into nuclear equipment qualification processes, customer applications, and regulatory proceedings, and which are not otherwise readily obtainable by a competitor.
5. RPC Radics LLC is transmitting this information to NRC in confidence.
6. As noted in attached Table 1, release of this information in a public forum could cause harm to RPC Radics LLC by revealing trade secrets and/or commercially sensitive design and operational details and technical processes related to designing, building, and/or operating a RadICS digital safety instrumentation and control system.
7. As RPC Radics LLC US Licensing Manager, I have been specifically delegated responsibility for reviewing the information sought to be withheld, and I am authorized to apply for its withholding on behalf of RPC Radics LLC.



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25009 Kirovograd, Ukraine

8. The foregoing statements are true and correct to the best of my knowledge,  
information, and belief.

Mark J. Burzynski

Mark J. Burzynski

US Licensing Manager

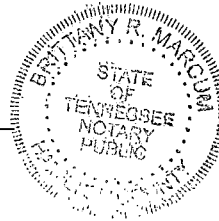
RPC Radics LLC

Sworn to and subscribed before me

this 10<sup>th</sup> day of August, 2018

Brittany R. Marcum

Notary Public



My commission expires: November 24, 2018

**Table 1. Documents requested for withholding from public disclosure**

<b>Document Title</b>	<b>Part of document sought to be withheld from public disclosure</b>	<b>Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)</b>	<b>Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public</b>
2016-RTS002-EQTSR-040, "Equipment Qualification Test Summary Report"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of by disclosure of the identified commercially sensitive information, which is of value to a competitor because it defines the specific qualification envelope and test processes applied to the RadICS Platform, which would enable competitors to make direct comparisons between the qualification processes and qualification envelopes for their safety I&C platform and the corresponding details for the RadICS Platform.
2017-RTS001-CGDSR_AOM-370, "Commercial Grade Dedication Summary Report for AOM"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.
2017-RTS001-CGDSR_LM-371, "Commercial Grade Dedication Summary Report for LM"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.
2017-RTS001-CGDSR_AIM-372, "Commercial Grade Dedication Summary Report for AIM"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.



Document Title	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public
2017-RTS001-CGDSR_DIM-373, "Commercial Grade Dedication Summary Report for DIM"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.
2017-RTS001-CGDSR_DOM-374, "Commercial Grade Dedication Summary Report for DOM"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.
2017-RTS001-CGDSR_OCM-375, "Commercial Grade Dedication Summary Report for OCM"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.
2017-RTS001-CGDSR_IOPM-376, "Commercial Grade Dedication Summary Report for IOPM"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.

Document Title	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public
2017-RTS001-CGDSR_CH-377, "Commercial Grade Dedication Summary Report for CH"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.
2017-RTS001-CGDSR_VM-378, "Commercial Grade Dedication Summary Report for VM"	Entire document (see Note 1).	Trade secrets and / or commercial information as per § 2.390(a)(4)	RPC Radics LLC would be harmed by disclosure of aspects of its commercially sensitive commercial grade dedication process and associated technical characteristics for the RadICS Modules, which would enable competitors to make direct comparisons between the dedication processes and critical characteristics for their safety I&C platform and the corresponding details for the RadICS Platform.

**Notes:**

- (1) These documents contain proprietary information in their entirety and are marked with the word "Proprietary" at the top of the first page of the document and at the top of each page containing such information. As noted in RIS 2014-01, in instances in which a nonproprietary version would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted.