



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

January 13, 2020

Ms. Cheryl A. Gayheart  
Regulatory Affairs Director  
Southern Nuclear Operating Company, Inc.  
3535 Colonnade Parkway  
Birmingham, AL 35243

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE  
FOR JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2 –  
RE: MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE  
(EPID L-2019-LLS-0002)

Dear Ms. Gayheart:

By letter dated October 30, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession Package No. ML19308A761), Ms. Cheryl A. Gayheart of Southern Nuclear Operating Company submitted four affidavits all dated August 21, 2019, executed by Joanna Phillips, on behalf of Cameron Holding Corporation (Cameron), requesting that the below four Engineering Reports to the above referenced letter, be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390:

Cameron Engineering Report: ER-1180 Rev. 1, "Bounding Uncertainty Analysis for Thermal Power Determination at Farley Unit 1 Using the LEFM $\sqrt{}$  + System" (CAW 19-01)

Cameron Engineering Report: ER-1181 Rev. 1, "Bounding Uncertainty Analysis for Thermal Power Determination at Farley Unit 2 Using the LEFM $\sqrt{}$  + System" (CAW 19-02)

Cameron Engineering Report: ER-1182 Rev. 1, "Meter Factor Calculation and Accuracy Assessment for Farley Unit 1" (CAW 19-03)

Cameron Engineering Report: ER-1183 Rev. 1, "Meter Factor Calculation and Accuracy Assessment for Farley Unit 2" (CAW 19-04)

Nonproprietary versions of the above documents can be found at ADAMS Accession No. ML19308A764.

By letter dated November 25, 2019 (ADAMS Accession No. ML19331A099), Ms. Janice M. Coleman, Licensing Manager of Southern Nuclear Operating Company submitted an affidavit dated November 14, 2019, executed by Joanna Phillips, Sensia, Nuclear Sales Manager on behalf of Cameron Holding Corporation (Cameron), requesting that the below Engineering Report be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390:

Cameron Engineering Report: ER-1182P Rev 1 and Rev 1 Errata "Meter Factor Calculation and Accuracy Assessment for Farley Unit 1" (CAW 19-07)

The nonproprietary version of the above document did not change from what was submitted in the letter dated October 30, 2019.

The five affidavits states, in part, that the Engineering Reports (CAW 19-01, CAW 19-02, CAW 19-03, CAW 19-04, CAW 19-07) be considered exempt from mandatory public disclosure for the following reasons:

5. Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
  - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Cameron.
  - (ii) The information is of a type customarily held in confidence by Cameron and not customarily disclosed to the public. Cameron has a rational basis for determining the types of information customarily held in confidence by it and, in that connection utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Cameron policy and provides the rational basis required. Furthermore, the information is submitted voluntarily and need not rely on the evaluation of any rational basis.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of Cameron's competitors without license from Cameron 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, and assurance of quality, or licensing a similar product.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs (a), (b) and (c), above.

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

Therefore, the proprietary version of CAW 19-01, CAW 19-02, CAW 19-03, CAW-19-04 and CAW 19-07 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, please contact me at (301) 415-1009 or [Shawn.Williams@nrc.gov](mailto:Shawn.Williams@nrc.gov).

Sincerely,

**/RA/**

Shawn A. Williams, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-348 and 50-364

cc: Joanna Phillips, Nuclear Sales Manager  
Caldon Ultrasonics Technology Center  
Cameron  
1000 McClaren Woods Drive  
Coraopolis, PA, 15108

Listserv

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**ADAMS Accession No.: ML19312B566**

OFFICE	NRR/DORL/LPL2-1/PM	NRR/DORL/LPL2-1/LA	NRR/DSS/SFNB/BC
NAME	SWilliams	KGoldstein	RLukes
DATE	12/09/2019	12/16/2019	12/17/2019
OFFICE	NRR/DEX/EICB/BC	NRR/DORL/LPL2-1/BC	DORL/LPL2 1/PM
NAME	MWaters	MMarkley	SWilliams
DATE	01/10/2020	01/10/2020	01/13/2020

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