

PROD 0669  
99902021

November 19, 2019

**To:** Nuclear Regulatory Commission (NRC)

**Subject:** SGMP-19-09: Meeting Material from the Steam Generator Task Force Meeting on  
November 14, 2019

**Purpose:**

The purpose of this letter is to provide the attached meeting material to the NRC technical staff along with an affidavit to withhold portions of the materials from public disclosure. Attached are two copies of the EPRI slides presented at the Steam Generator Task Force (SGTF) on November 14, 2019. Proprietary slides have been redacted. The slides that remain can be released to public.

**Discussion:**

The SGTF held a meeting with the Nuclear Regulatory Commission (NRC) on November 14, 2019. During this meeting, there was a portion of the meeting that was open to all the public and there was a portion of the meeting closed to the public to discuss proprietary issues. The attached slides are from the proprietary portion of the meeting.

**Request for Response:**

If you have any questions, please contact Helen Cothron at 865-773-4033 or by email at [hcothron@epri.com](mailto:hcothron@epri.com).

Sincerely,



Helen Cothron  
Program Manager, SGMP  
Electric Power Research Institute

cc: Steam Generator Management Program (SGMP) Research Integration Committee (RIC)  
Jim Benson

Attachments: Complete Meeting Presentation Material  
Redacted Presentation Material  
Affidavit

DO35  
NRA

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*Ref. EPRI Project Number 669*

November 19, 2019

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

Subject: Request for Withholding of the Following Commercial Document:  
SGMP-19-09: Meeting Material from the Steam Generator Task Force Meeting on  
November 14, 2019

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 commercial information owned by Electric Power Research Institute, Inc. ("EPRI") identified above (the "Meeting Material"). Proprietary and non-proprietary versions of the Meeting Material and the Affidavit in support of this request are enclosed.

EPRI desires to disclose portions of the Meeting Material in confidence as a means of exchanging technical information with the NRC. The attached redacted version of the Meeting Material may be included with the public information regarding the November 14, 2019 meeting. However, the attached complete version of the material should not be divulged to anyone outside of the NRC nor shall any copies be made of this version of the Meeting Material. 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 (704) 595-2630. Questions on the content of the Meeting Material should be directed to Helen Cothron of EPRI at (865) 773-4033.

Sincerely,



Attachment(s)

cc: Sheldon Stuchell, NRC (sheldon.stuchell@nrc.gov)

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## **AFFIDAVIT**

RE: Request for Withholding of the Following Commercial Document:

SGMP-19-09: Meeting Material from the Steam Generator Task Force  
Meeting on November 14, 2019

I, Steven Swilley, being duly sworn, depose and state as follows:

I am the Senior Director and Deputy 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 Meeting Material that is sought under this Affidavit to be withheld (the Meeting Material). I am authorized to apply to the U.S. Nuclear Regulatory Commission ("NRC") for the withholding of portions of the Meeting Material on behalf of EPRI.

EPRI requests that the portions of the Meeting Material marked proprietary 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 Meeting Material is owned by EPRI and constitutes commercial information which has not been placed in the public domain by EPRI.

b. EPRI made a substantial economic investment to develop the results presented and, by prohibiting public disclosure, EPRI derives an economic benefit in the form of fees charged for the sale of the results presented. The Meeting Material is entitled to the protection of the United States copyright laws. If the Meeting Material was publicly available to consultants and/or other businesses providing services in the electric and/or nuclear power industry at no cost, these entities would be able to use the Meeting Material for their own commercial benefit and profit and without expending the substantial economic resources required of EPRI to develop the results presented.

c. EPRI made a substantial investment of both money and employee hours over an extended period of time in the development of the results presented. As a result of such effort and cost, both in terms of dollars spent and dedicated employee time, the Meeting Material is highly valuable to EPRI.

d. A public disclosure of the proprietary Meeting Material would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to sell the results presented both domestically and internationally. If a party does not purchase the results presented from EPRI, it would require an investment of money, time and effort equivalent to that expended by EPRI for the party to duplicate the results presented.

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 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: Nov 20, 2019

[Signature]

Steven Swilley

(State of North Carolina)  
(County of Mecklenburg)

Subscribed and sworn to (or affirmed) before me on this 20 day of November 2019 by Steven Swilley, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Robin Thompson (Seal)

My Commission Expires 22 day of September 2024

