

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

November 2, 2007

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Serial No. 07-0693B  
NL&OS/GDM R0  
Docket Nos. 50-280/281  
License Nos. DPR-32/37

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**EXIGENT LICENSE AMENDMENT REQUEST (TAC NOS. MD7033 AND MD7034)**  
**ALTERNATIVE CONTAINMENT ANALYSIS METHODOLOGY**  
**REQUEST INFORMATION - GOTHIC MODEL INPUT FILES**

In an October 22, 2007 letter (Serial No. 07-0693), Virginia Electric and Power Company (Dominion) requested an amendment to the licensing basis for Facility Operating License Numbers DPR-32 and DPR-37 for Surry Power Station Units 1 and 2, respectively. The proposed amendment will permit the use of an alternate GOTHIC containment analysis methodology in support of the implementation of modifications to resolve Generic Safety Issue (GSI) 191, *Assessment of Debris Accumulation on PWR Sump Performance*, as committed to in Dominion's response to Generic Letter 2004-02, *"Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors."*

To support review of the alternative methodology, the NRC requested Dominion provide a CD-ROM with GOTHIC model files. The model files are being provided on the attached CD-ROM.

The CD-ROM contains information that is considered proprietary commercial information to Dominion. Therefore, consistent with 10 CFR 2.390(b)(1), Dominion is providing an affidavit in the attachment to this letter with the basis for withholding the information as proprietary.

ADD1

NRK

If you have any questions or require additional information, please contact Mr. Gary D. Miller at (804) 273-2771.

Very truly yours,

  
Gerald T. Bischof  
Vice President – Nuclear Engineering

Attachments

1. CD-ROM C - GOTHIC model files
- 2 Application for Withholding and Affidavit of Gerald T. Bischof

Commitments made in this letter: None.

Document Components

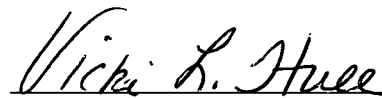
001 Base Case - ps-full72a.GTH; 9,897,984 bytes; proprietary  
002 New Case - ps-full72alv51.GTH; 9,967,616 bytes; proprietary

COMMONWEALTH OF VIRGINIA           )  
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COUNTY OF HENRICO                    )

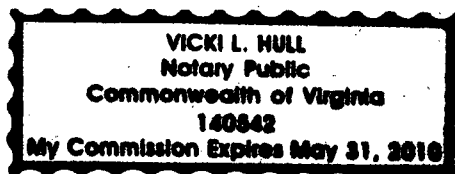
The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gerald T. Bischof, who is Vice President – Nuclear Engineering, of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 2<sup>nd</sup> day of November, 2007.

My Commission Expires: May 31, 2010.

  
Notary Public

(SEAL)



cc: U.S. Nuclear Regulatory Commission (w/o attachment 1)  
Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Suite 23T85  
Atlanta, Georgia 30303

Mr. J. E. Reasor, Jr. (w/o attachment 1)  
Old Dominion Electric Cooperative  
Innsbrook Corporate Center  
4201 Dominion Blvd.  
Suite 300  
Glen Allen, Virginia 23060

State Health Commissioner (w/o attachment 1)  
Virginia Department of Health  
James Madison Building - 7<sup>th</sup> floor  
109 Governor Street  
Suite 730  
Richmond, Virginia 23218

Mr. J. T. Reece (w/o attachment 1)  
NRC Senior Resident Inspector  
North Anna Power Station

Mr. S. P. Lingam (w/o attachment 1)  
NRC Project Manager  
U. S. Nuclear Regulatory Commission  
One White Flint North  
Mail Stop O-8 G9A  
11555 Rockville Pike  
Rockville, Maryland 20852

Mr. R. A. Jervey (w/o attachment 1)  
NRC Project Manager  
U. S. Nuclear Regulatory Commission  
One White Flint North  
Mail Stop O-8 G9A  
11555 Rockville Pike  
Rockville, Maryland 20852

**ATTACHMENT 2**

**Application for Withholding and Affidavit of Gerald T. Bischof**

**Virginia Electric and Power Company  
Surry Power Station Units 1 and 2**

**APPLICATION FOR WITHHOLDING AND AFFIDAVIT OF**  
**GERALD T. BISCHOF**

I, Gerald T. Bischof, Vice President – Nuclear Engineering, state that:

1. I am authorized to execute this affidavit on behalf of Virginia Electric and Power Company (Dominion).
2. Dominion has submitted a CD-ROM that contains the electronic GOTHIC model files from the demonstration cases in Section 3.3 of Attachment 1 from Dominion letter dated October 22, 2007 (Serial No.07-0693). The CD-ROM contains proprietary commercial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR §§ 2.390(a)(4) because:
  - a. This information is being held in confidence by Dominion.
  - b. This information is of a type that is held in confidence by Dominion, and there is a rational basis for doing so because the information contains sensitive commercial information concerning Dominion's containment analysis methodology.
  - c. This information is being transmitted to the NRC in confidence.
  - d. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - e. Public disclosure of this information would create substantial harm to the competitive position of Dominion by disclosing confidential Dominion internal containment analysis methodology information to other parties whose commercial interests may be adverse to those of Dominion. Furthermore, Dominion has expended significant engineering resources in the development of the information. Therefore, the use of this confidential information by competitors would permit them to use the information developed by Dominion without the expenditure of similar resources, thus giving them a competitive advantage.

3. Disclosure pursuant to the policy reflected in 10 CFR §§ 2.390(a)(4).



Gerald T. Bischof  
Vice President – Nuclear Engineering

COMMONWEALTH OF VIRGINIA     )  
  )  
COUNTY OF HENRICO            )

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Acknowledged before me this 2<sup>nd</sup> day of November, 2007.

My Commission Expires: May 31, 2010.

  
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Notary Public

(SEAL)

