**PROPRIETARY INFORMATION-WITHHOLD UNDER 10 CFR 2.390**

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

January 27, 2010

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

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| Serial No. | 09-223A |
| NLOS/GDM | R1 |
| Docket Nos. | 50-280 |
| | 50-281 |
| License Nos. | DPR-32 |
| | DPR-37 |

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**
**SURRY POWER STATION UNITS 1 AND 2**
**LICENSE AMENDMENT REQUEST**
**MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE**
**PROPRIETARY SUPPORTING DOCUMENTS**

Pursuant to 10 CFR 50.90, under separate cover (Letter Serial No. 09-223 dated January 27, 2010) Dominion is requesting amendments to Operating Licenses DPR-32 and DPR-37 for Surry Power Station Units 1 and 2, respectively. This measurement uncertainty recapture (MUR) power uprate License Amendment Request (LAR) would increase each unit's authorized core power level from 2546 megawatts thermal (MWt) to 2587 MWt and make changes to the Surry Technical Specifications as necessary to support operation at the uprated power level. The proposed change is an increase in maximum power level (Rated Thermal Power) of approximately 1.6% from the current reactor output.

Information provided in the attachments to this letter is summarized below:

- Attachment 1 provides the Cameron Application for Withholding Proprietary Information from Public Disclosure, and the associated affidavit, concerning the 10 CFR 2.390 information to be withheld from public disclosure.
- Attachment 2 provides the Cameron Bounding Uncertainty Analysis Report for Surry Unit 1 (Proprietary).
- Attachment 3 provides the Cameron Bounding Uncertainty Analysis Report for Surry Unit 2 (Proprietary).
- Attachment 4 provides the Cameron Meter Factor Report for Surry Unit 1 (Proprietary)
- Attachment 5 provides the Cameron Meter Factor Report for Surry Unit 2 (Proprietary)

Attachments 2 through 5 contain information proprietary to Cameron. The proprietary information is supported by Cameron letter CAW-09-06, "Application for Withholding

**ATTACHMENTS 2 THROUGH 5 CONTAIN PROPRIETARY INFORMATION THAT IS BEING WITHHELD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390. UPON SEPARATION OF ATTACHMENTS 2 THROUGH 5, THIS PAGE IS DECONTROLLED.**

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NRR

Proprietary Information from Public Disclosure," dated September 16, 2009, with accompanying affidavit signed by Cameron, the owner of the information. The Cameron letter is included in Attachment 1 as noted above. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information be withheld from public disclosure in accordance with 10 CFR 2.390.

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

Sincerely,

L. N. Hartz
Vice President - Nuclear Support Services

Commitments made in this letter: None

Attachments:

1. Cameron Application for Withholding Proprietary Information from Public Disclosure and Associated Affidavit
2. Cameron Bounding Uncertainty Analysis Report (ER-650, Rev. 2) for Unit 1 (Proprietary)
3. Cameron Bounding Uncertainty Analysis Report (ER-651, Rev. 1) for Unit 2 (Proprietary)
4. Cameron Meter Factor Report (ER-684, Rev. 2) for Unit 1 (Proprietary)
5. Cameron Meter Factor Report (ER-690, Rev. 2) for Unit 2 (Proprietary)

COMMONWEALTH OF VIRGINIA )
)
COUNTY OF HENRICO )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Leslie N. Hartz, who is Vice President – Nuclear Support Services, of Virginia Electric and Power Company. She has affirmed before me that she 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 her knowledge and belief.

Acknowledged before me this 27TH day of January, 2010.

My Commission Expires: May 31, 2010.

Vicki L. Hull
Notary Public

VICKI L. HULL
Notary Public
Commonwealth of Virginia
140542
My Commission Expires May 31, 2010

cc: U.S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Suite 23T85
Atlanta, Georgia 30303

NRC Senior Resident Inspector
Surry Power Station

State Health Commissioner
Virginia Department of Health
James Madison Building – 7th Floor
109 Governor Street
Suite 730
Richmond, Virginia 23219

Ms. K. R. Cotton
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop O8 G9A
11555 Rockville Pike
Rockville, Maryland 20852-2738

Dr. V. Sreenivas
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop O8 G9A
11555 Rockville Pike
Rockville, Maryland 20852-2738

**Attachment 1**

**CAMERON APPLICATION FOR WITHHOLDING PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE AND ASSOCIATED AFFIDAVIT**

**Virginia Electric Power Company**
**(Dominion)**
**Surry Power Station Units 1 and 2**

**Measurement Systems**

Caldon® Ultrasonics Technology Center
1000 McClaren Woods Drive
Coraopolis, PA 15108
Tel 724-273-9300
Fax 724-273-9301
www.c-a-m.com

CAMERON

September 16, 2009
CAW 09-06

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

**APPLICATION FOR WITHHOLDING PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE**

Subject:

1. Caldon® Ultrasonics Engineering Report ER-650 Rev. 2 "Bounding Uncertainty Analysis for Thermal Power Determination at Surry Unit 1 Using the LEFM✓ + System"

2. Caldon® Ultrasonics Engineering Report No. ER-648 Rev. 2, "LEFM✓ + Meter Factor Calculation and Accuracy Assessment for Surry Unit 1"

3. Caldon® Ultrasonics Engineering Report ER-651 Rev. 1 "Bounding Uncertainty Analysis for Thermal Power Determination at Surry Unit 2 Using the LEFM✓ + System"

4. Caldon® Ultrasonics Engineering Report No. ER-690 Rev. 2, "LEFM✓ + Meter Factor Calculation and Accuracy Assessment for Surry Unit 2"

Gentlemen:

This application for withholding is submitted by Cameron International Corporation, a Delaware Corporation (herein called "Cameron") on behalf of its operating unit, Caldon Ultrasonics Technology Center, pursuant to the provisions of paragraph (b)(1) of Section 2.390 of the Commission's regulations. It contains trade secrets and/or commercial information proprietary to Cameron and customarily held in confidence.

The proprietary information for which withholding is being requested is identified in the subject submittal. In conformance with 10 CFR Section 2.390, Affidavit CAW 09-06 accompanies this application for withholding setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information, which is proprietary to Cameron, be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to this application for withholding or the accompanying affidavit should reference CAW 09-06 and should be addressed to the undersigned.

Very truly yours,

CR Hastings

Calvin R. Hastings
General Manager

Enclosures (Only upon separation of the enclosed confidential material should this letter and affidavit be released.)

September 16, 2009
CAW 09-06

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF ALLEGHENY:

Before me, the undersigned authority, personally appeared Calvin R. Hastings, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Cameron International Corporation, a Delaware Corporation (herein called "Cameron") on behalf of its operating unit, Caldon Ultrasonics Technology Center, and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:

CR Hastings
Calvin R. Hastings
General Manager

Sworn to and subscribed before me

this 16th day of

September, 2009

Joann B Thomas
Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Joann B. Thomas, Notary Public
Findlay Twp., Allegheny County
My Commission Expires July 28, 2011
Member, Pennsylvania Association of Notaries

1. I am the General Manager of Caldon Ultrasonics Technology Center, and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of Cameron.

2. I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Cameron application for withholding accompanying this Affidavit.

3. I have personal knowledge of the criteria and procedures utilized by Cameron in designating information as a trade secret, privileged or as confidential commercial or financial information. The material and information provided herewith is so designated by Cameron, in accordance with those criteria and procedures, for the reasons set forth below.

4. 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.

(d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Cameron, its customer or suppliers.

(e) It reveals aspects of past, present or future Cameron or customer funded development plans and programs of potential customer value to Cameron.

(f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Cameron system, which include the following:

(a) The use of such information by Cameron gives Cameron a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Cameron competitive position.

(b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Cameron ability to sell products or services involving the use of the information.

(c) Use by our competitor would put Cameron at a competitive disadvantage by reducing his expenditure of resources at our expense.

(d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Cameron of a competitive advantage.

(e) Unrestricted disclosure would jeopardize the position of prominence of Cameron in the world market, and thereby give a market advantage to the competition of those countries.

(f) The Cameron capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.

(iii) The information is being transmitted to the Commission in confidence, and, under the provisions of 10 CFR §§ 2. 390, it is to be received in confidence by the Commission.

(iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same manner or method to the best of our knowledge and belief.

(v) The proprietary information sought to be withheld are the submittals titled:

- Caldon® Ultrasonics Engineering Report ER-650 Rev. 2 "Bounding Uncertainty Analysis for Thermal Power Determination at Surry Unit 1 Using the LEFM✓+ System"

- Caldon® Ultrasonics Engineering Report No. ER-684 Rev. 2, "LEFM✓+ Meter Factor Calculation and Accuracy Assessment for Surry Unit 1"

- Caldon® Ultrasonics Engineering Report ER651 Rev. 1 "Bounding Uncertainty Analysis for Thermal Power Determination at Surry Unit 2 Using the LEFM✓+ System"

- Caldon® Ultrasonics Engineering Report No. ER-690 Rev. 2, "LEFM✓+ Meter Factor Calculation and Accuracy Assessment for Surry Unit 2"

It is designated therein in accordance with 10 CFR §§ 2.390(b)(1)(i)(A,B), with the reason(s) for confidential treatment noted in the submittal and further described in this affidavit. This information is voluntarily submitted for use by the NRC Staff in their review of the accuracy assessment of the proposed methodology for LEFM CheckPlus Systems used by Surry Units 1 and 2 for an MUR UPRATE.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Cameron because it would enhance the ability of competitors to provide similar flow and temperature measurement systems and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Cameron effort and the expenditure of a considerable sum of money.

In order for competitors of Cameron to duplicate this information, similar products would have to be developed, similar technical programs would have to be performed, and a significant manpower effort, having the requisite talent and experience, would have to be expended for developing analytical methods and receiving NRC approval for those methods.

Further the deponent sayeth not.