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July 31, 2013

dom.com

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

Serial No. NA3-13-012  
Docket No. 52-017  
COL/JDH

**DOMINION VIRGINIA POWER**  
**NORTH ANNA UNIT 3**  
**COMBINED LICENSE APPLICATION – SUBMISSIONS 12 AND 13**

This letter forwards Submissions 12 (Sensitive Unclassified Non-Safeguards Information (SUNSI) version) and 13 (Public version) of the North Anna 3 (NA3) Combined License Application (COLA). The submissions include revisions to Part 1, *General and Administrative Information*; Part 2, *Final Safety Analysis Report*, Part 3, *Environmental Report*; Part 4, *Technical Specifications*; Part 5, *Emergency Plan*; Part 7, *Departures Report*; Part 8, *Security*; and Part 10, *Tier 1/ITAAC/License Conditions*. Part 11, *Enclosures*, which was used in the previous revision, has been eliminated in this submission; corresponding information will be included in the December 2013 submittal as part of Part 2. In parallel, revisions to certain documents in Part 8, *Security*, that contain Safeguards Information are being submitted by separate letter (Letter Serial No. NA3-13-011) dated the same as this letter.

As stated in Dominion's April 25, 2013 letter to NRC (NRC Accession No. ML13120A016), the submissions reflect Dominion's selection of General Electric Hitachi's (GEH) ESBWR technology (Docket No. 52-010) for North Anna Unit 3. With this submittal, the NA3 COLA now incorporates by reference Revision 9 of the Design Control Document (DCD) for the ESBWR design.

Changes included in Submissions 12 and 13 are described in the *Revision Summary* sections of the COLA.

This submittal fulfills Dominion's commitment to submit a COLA revision in July 2013 that restores the application to ESBWR technology and updates certain COLA sections. Dominion also committed to include an action plan with the submittal that provides the schedule for updating the remaining COLA content. A list of the COLA sections updated by Submissions 12 and 13, and a detailed Action Plan for updating the remaining COLA content and associated RAI responses, are provided in Enclosure 1.

Enclosure 2 consists of one set of two DVDs containing the SUNSI version of the NA3 COLA (Submission 12). Each DVD is conspicuously marked with "Withhold from Public

D089  
NRD

disclosure under 10 CFR 2.390” because proprietary information is contained in Parts 1 and 3, and security-related sensitive information (SRI) is contained in Parts 2, 3 and 8. The proprietary information in Parts 1 and 3 should be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4). An affidavit providing the justification for treating the information as proprietary and a request to withhold the information from public disclosure is provided in Enclosure 3. In accordance with NRC Regulatory Issue Summary 2005-26, an affidavit to support withholding of SRI is not required.

A second DVD containing the public version of the NA3 COLA (Submission 13) is provided as Enclosure 4. Additional copies of the DVDs are available upon request.


Dominion has performed the pre-flight checks and examined the PDF files contained on the DVDs to ensure conformance with NRC guidelines related to electronic submittals. The results of the pre-flight checks are presented in Enclosure 5.

In preparing this COLA revision, Dominion has taken advantage of the work previously performed by both the NRC and us before June 2010 when Dominion’s application was the R-COLA for the ESBWR technology. We have also taken advantage of the work performed between June 2010 and April 2013 when the NA3 COLA was an S-COLA for MHI’s US-APWR technology. On June 5, 2013, we met with NRC to describe how we intended to incorporate both those efforts and how the NRC’s review might now proceed effectively and efficiently. The NRC has since acknowledged our approach and described its review plans for the revised NA3 COLA in a letter dated June 25, 2013 (ML13175A115).

This COLA revision utilizes various techniques to present content in an easy-to-understand form. Certain techniques are familiar and described in COLA Part 2, Chapter 1, such as Left Margin Annotation (LMA). Other techniques, unique to this submittal, are discussed in Enclosure 6. Overall, Dominion believes the best way to familiarize the NRC Staff with all aspects of this COLA revision would be in a public meeting. Therefore, once the NRC Staff has had an opportunity to review this submittal, we propose to meet at a mutually agreeable time to discuss this COLA revision in detail.

Please contact Joseph D. Hegner (joseph.hegner@dom.com;804-273-2770) if you have questions.

Very truly yours,



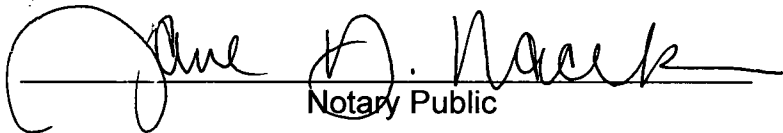
Eugene S. Grecheck

COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President-Nuclear Engineering and Development of Virginia Electric and Power Company (Dominion Virginia Power). He has affirmed before me that he is duly authorized to execute and file the foregoing document on behalf of the Company, and that the portions of the COLA that have been revised and updated are true to the best of his knowledge and belief.

Acknowledged before me this 18 day of July, 2013  
My registration number is 112534 and my  
Commission expires: April 30, 2015

  
Notary Public

Enclosures:

1. NA3 COLA Action Plan
2. NA3 COLA Submission 12 DVD – SUNSI version
3. Application for Withholding and Affidavit
4. NA3 COLA Submission 13 DVD – Public version
5. Results of Pre-flight Checks for Electronic Submittals
6. Techniques for Labeling COLA Content

Commitments made by this letter: See Enclosure 1 – Action Plan

cc: w/NA3 COLA DVD - SUNSI version  
U. S. Nuclear Regulatory Commission, Region II  
C. P. Patel, NRC  
T. S. Dozier, NRC  
G. J. Kolcum, NRC

w/NA3 COLA DVD - Public version  
R. Weeks, VDEQ  
T. Lough, SCC

**Enclosure 1  
NA3 COLA Action Plan**

This table lists the commitments Dominion has made for submitting the remaining NA3 COLA updates and related information.

<b>Committed Completion Date</b>	<b>Commitment</b>
August 30, 2013	Submit a table with the disposition of NRC Requests for Information (RAI) responses on the NA3 COLA docket associated with COLA content that was updated by this submittal and provide revised responses, where appropriate.
December 31, 2013	Submit a COLA revision that includes the remaining NA3 COLA content. Note: Submittal of the remaining Part 2, FSAR, content at this time fulfills Dominion's obligation to annually update the FSAR as required by 10CFR50.71(e)(3)(iii).
December 31, 2013	Submit a table with the disposition of NRC RAI responses on the NA3 COLA docket associated with COLA content updated in December 2013, and submit revised responses, where appropriate.

**NA 3 COLA Content Table**

This table lists the NA3 COLA content updated by this submittal and the content scheduled for update in December 2013. The COLA parts and chapters listed below are shown when the update for that part or chapter is complete. A detailed version of the table was presented to the NRC at a June 5, 2013 public meeting (ML13172A119).

<b>July 2013 Update</b>	<b>December 2013 Update</b>
Part 1, Administrative & Financial Information	Part 2, FSAR, Chapters 1, 2, 3, 6, 8, 9, 10, 11, 12
Part 2, FSAR, Chapters 4, 5, 7, 13, 14, 15, 16, 17, 18, 19	Part 3, Environmental Report, Chapters 1, 2, 3, 4, 5, 7 and 10
Part 3, Environmental Report, Chapters 6, 8 and 9	Part 7, Departures Report
Part 4, Technical Specifications	Part 8, Security
Part 5, Emergency Plan	Part 10, Tier 1, ITAAC & License Conditions

**Enclosure 2**

NA3 COLA Update—SUNSI Version

One DVD labeled

“North Anna 3 Combined License Application  
Withhold from Public disclosure Under 10 CFR 2.390”  
NRC ADAMS Version  
Submission 12; July 2013

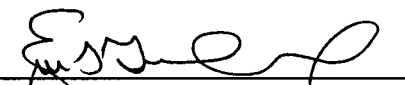
**Enclosure 3 – Request for Withholding**

COMMONWEALTH OF VIRGINIA                    )  
  )        ss.  
COUNTY OF HENRICO                            )

**10 CFR 2.390 and 9.17(a)(4)  
Affidavit of Eugene S. Grecheck**

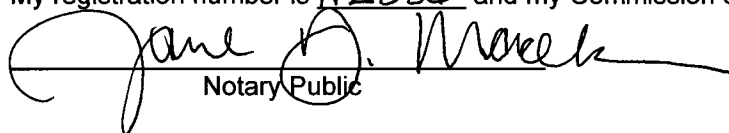
I, Eugene S. Grecheck, Vice President-Nuclear Engineering and Development of Virginia Electric and Power Company, dba Dominion Virginia Power (Dominion), being duly sworn according to law, depose and state the following:

1. I am authorized to execute this affidavit on behalf of Dominion.
2. Dominion is submitting to the NRC a revision to the North Anna Unit 3 Combined License Application, designated as Dominion letter No. NA3-13-012. Enclosure 2 of Dominion letter No. NA3-13-012 (designated Submission 12) contains certain proprietary financial information that should be held in confidence by the NRC pursuant to 10 CFR 2.390(a)(4) and 9.17(a)(4). The proprietary financial information is identified in the enclosure by bracketed text and marginal annotations. This information should be withheld from public disclosure because:
  - a. The information is and has been 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 financial information concerning Dominion's estimated construction costs related to North Anna Unit 3.
  - 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 financial information associated with construction costs for North Anna Unit 3 to other parties whose commercial interests may be adverse to those of Dominion. The use of this confidential financial 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. Accordingly, Dominion requests that the designated document be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 9.17(a)(4).

  
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Eugene S. Grecheck  
Vice President – Nuclear Engineering and Development

Acknowledged before me this 18<sup>th</sup> day of July, 2013

My registration number is 112536 and my Commission expires April 30, 2015

  
\_\_\_\_\_  
Notary Public

**Enclosure 4**

NA3 COLA Update—Public Version

One DVD labeled  
“North Anna 3 Combined License Application”  
NRC ADAMS Version  
Submission 13; July 2013

## Enclosure 5

### Electronic Submittals Conformance with NRC Guidance

Dominion has confirmed that the submission and packing slip files on the enclosed DVDs conform to the criteria for COLA submissions in *Guidance for Electronic Submissions to the NRC*, Revision 6.1, dated May 27, 2011.

NRC-provided settings for electronic preflight include a check to detect content that does not meet the minimum resolution requirement for scanned documents. This check detects and flags any raster image content below the threshold for scanned documents. The following content was generated from native applications, not by scanning, and is therefore not subject to the resolution criterion for scanned documents:

- COLA Part 3, Figures 5.8-1, -2, and -3 (original digital photographs)  
Figures 8.0-1, 8.0-4, 8.1-1, 8.1-6, 8.3-1, 8.3-5 (original electronic artwork)
- COLA Part 5, Figure I-1 (original electronic artwork)

This submittal consists of PDF files, one or more of which includes hyperlinks to other files. These hyperlinks are not essential to the use of the filing. No material referenced by URL is essential for using this filing. Material referenced by a hyperlink to another PDF essential for the use of this filing has been included by reference or submitted as part of this filing.



## Enclosure 6

### Techniques for Labeling COLA Content

Dominion used two techniques to aid the reader in understanding the COLA content (i.e., text, tables and figures) being presented in this submittal. The two techniques are termed: 1) page basis and 2) shading. Each is explained below.

#### **Page “Basis”**

Beginning with the initial submittal in November 2007, the North Anna COLA incorporated by reference first GEH’s ESBWR technology, then MHI’s US-APWR technology, and now, with this submittal, a return to the ESBWR. This COLA revision incorporates content from both the ESBWR-based R-COLA and the US-APWR-based S-COLA.

The majority of this COLA revision used Submissions 4/5 (which were the last ESBWR-based R-COLA submissions Dominion submitted in 2009) as a starting point to create this revision. Pages based on that ESBWR version are marked accordingly and change bars on those pages indicate changes from that version of the document.

However, there are some sections in this revision where it was more logical and efficient to use the US-APWR COLA content currently on the docket (Submissions 10/11) as a starting point. Pages based on the US-APWR version are marked accordingly and change bars on those pages indicate changes from that version of the document.

To aid the reader in identifying which version of the COLA was used as the starting point to create this COLA revision, the “basis” is displayed in the upper left-corner of each page for Parts 2 and 3 as either “US-APWR” or “ESBWR.” The reader is thus reminded that any change bars on that page indicate changes to content from the version of the COLA that served as the basis for that page’s content. For other COLA parts, the cover page of the document is simply labeled “US-APWR” or “ESBWR.” Note that the labeling simply means that the content is based on that COLA version and does not signify that the content is technology-dependent.

#### **Shading**

As part of Dominion’s commitment to update the NA3 COLA in 2013, we committed to return the entire COLA to ESBWR technology with the initial submittal, though the update would not be complete until December. As a result, the entire COLA now incorporates ESBWR-based content. However, certain content has not yet been updated. Pages with content not-yet-updated are shaded in gray and easily recognizable. For those pages, the content remains visible but should be ignored because it has not yet been updated. The shading will be removed when the content is updated in December.