

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

~~PROPRIETARY INFORMATION WITHHOLD UNDER 10 CFR 2.390~~

November 18, 2015

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Director, Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
Washington, DC 20555-0001

Serial No. 15-369C
NLOS/TJS R0
Docket No. 72-16
License No. SNM-2507

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION INDEPENDENT SPENT FUEL STORAGE
INSTALLATION
PROPOSED TECHNICAL SPECIFICATION CHANGE REQUEST REGARDING
STORAGE OF INCREASED MAXIMUM ENRICHMENT AND BURN-UP FUEL IN A
MODIFIED TN-32B STORAGE CASK
SUBMITTAL OF SUPPLEMENTAL INFORMATION

On August 24, 2015, Virginia Electric and Power Company (Dominion) requested an amendment (NRC Accession No. ML15239B251) in the form of revisions to the Technical Specifications to License Number SNM-2507 for the North Anna Power Station (NAPS) Independent Spent Fuel Storage Installation (ISFSI). The proposed amendment would allow storage of spent fuel in a modified TN-32B bolted lid cask as part of the High Burn-up Dry Storage Cask Research and Development Project sponsored by the Department of Energy (DOE) and the Electric Power Research Institute (EPRI).

On October 30, 2015, NRC Senior Project Manager John Nguyen requested several calculations referenced in the above submittal. The requested material was supplied to Dominion by AREVA/TN (Attachment 1). All material was determined to be proprietary by AREVA/TN as attested to in the attached affidavit (Attachment 2).

NMSS26

**ATTACHMENT 1 CONTAINS INFORMATION THAT IS BEING WITHHELD
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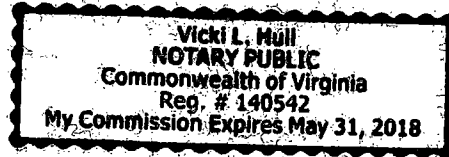
If you have any questions or require additional information, please contact Mr. Thomas Szymanski at (804) 273-3065.

Sincerely,



Mark D. Sartain
Vice President – Nuclear Engineering

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)



The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain, 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 18TH day of November, 2015.

My Commission Expires: 5-31-18.


Notary Public

Commitments made in this letter: None

Attachments:

1. Requested AREVA/TN Calculations Concerning HBU Cask
2. AREVA/TN Affidavit for Information Contained in Attachment 1

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cc: U.S. Nuclear Regulatory Commission (w/o attachments)
Region II
Marquis One Tower
245 Peachtree Center Avenue, NE Suite 1200
Atlanta, Georgia 30303-1257

NRC Senior Resident Inspector (w/o attachments)
North Anna Power Station

Mr. John N. Nguyen
Senior Project Manager
U. S. Nuclear Regulatory Commission
Two White Flint North
Mail Stop T4B34
11545 Rockville Pike
Rockville, Maryland 20852-2738

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

State Health Commissioner (w/o attachments)
Virginia Department of Health
James Madison Building – 7th Floor
109 Governor Street
Room 730
Richmond, Virginia 23219

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ATTACHMENT 2

AREVA/TN Affidavit for Information Contained in Attachment 1

**North Anna Power Station ISFSI
Virginia Electric and Power Company**

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November 2, 2015
E-43712 Rev. 0

Don McGee, PM
Mail Code CLT-1D
7207 IBM Dr.
Charlotte, NC 28262

Subject: NRC Request #3 for Design Basis Documents Supporting License Amendment Request Serial No. 15-369 to License SNM-2507 Docket No. 72-16

Dear Mr. McGee:

This correspondence is written to provide AREVA TN response to a request by the NRC to receive copies of select design basis calculations that support the subject License Amendment Request (LAR). This LAR is for the storage of high burn up nuclear fuel at the North Anna Power Station as part of a project to monitor the effects of long-term storage. The documents requested are being transmitted to Dominion Power under proprietary agreement and, subsequently, forwarded on to the NRC via an affidavit pursuant to 10 CFR 2.390.

The specific calculations are being transmitted electronically and are identified as follows:

19885-0501 Rev. 0
19885-0502 Rev. 0
19885-0503 Rev. 0
19885-0504 Rev. 0

Reference: TN-32B HBU Demonstration Cask Design/Licensing Basis Document #E-42038, Attachment 6 to LAR Serial No. 15-369

Sincerely,

A handwritten signature in cursive script that reads 'T. M. Edwards'.

Tom Edwards
Design Project Engineer

cc: Phil Lozmack (PM) Rod Gooch (PM)
Ken Legg (QAS) Shawna O'Brien (DCA)
Dennis Williford (Licensing) Project File 19885 – Outgoing Correspondence

AREVA TN

AREVA Inc.
7135 Minstrel Way - Suite 300 - Columbia, MD 21045 USA
Tel.: (410) 910-6900 - Fax: (410) 910-6902
us.areva.com/AREVATN

**AFFIDAVIT PURSUANT
TO 10 CFR 2.390**

AREVA Inc.)
State of Maryland) SS.
County of Howard)

I, Paul Triska, depose and say that I am a Vice President of AREVA Inc., duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is listed below:

- Calculation 19885-0501, Revision 0
- Calculation 19885-0502, Revision 0
- Calculation 19885-0503, Revision 0
- Calculation 19885-0504, Revision 0

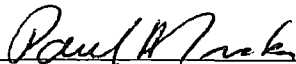
These calculations have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by AREVA Inc. in designating information as a trade secret, privileged, or as confidential commercial or financial information.

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, included in the above referenced document, should be withheld.

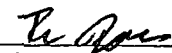
- 1) The information sought to be withheld from public disclosure involves shielding evaluations (including source terms and dose analyses) associated with the design of the modified TN-32B dry storage cask (High Burnup Fuel Cask Demonstration Project), which are owned and have been held in confidence by AREVA Inc.
- 2) The information is of a type customarily held in confidence by AREVA Inc. and not customarily disclosed to the public. AREVA Inc. has a rational basis for determining the types of information customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of AREVA Inc. because the information consists of descriptions of the design and analysis of the modified TN-32B dry spent fuel storage cask, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with AREVA Inc., take marketing or other actions to improve their product's position or impair the position of AREVA Inc.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.



Paul Triska
Vice President, AREVA Inc.

Subscribed and sworn before me this 4th day of November, 2015.



Notary Public
My Commission Expires 10 / 16 / 19