PROPRIETARY INFORMATION - WITHHOLD UNDER 10 CFR 2.390

December 28, 2015

U. S. Nuclear Regulatory CommissionSetATTN: Document Control DeskNIDirector, Division of Spent Fuel Storage and TransportationDoOffice of Nuclear Material Safety and SafeguardsLieWashington, DC 20555-0001Set

Serial No. 15-369G 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 (STRUCTURAL)

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 December 08, 2015, NRC Senior Project Manager John Nguyen requested the items provided in Attachment 1 to this letter and referenced in the submittal discussed above. One of the items requested was the TN-32 Updated Final Safety Analysis Report, Revision 6, dated April 2014. This document was previously submitted to the NRC by AREVA/TN as an attachment to AREVA/TN letter E-37975 dated April 16, 2014. The AREVA/TN letter can be found on ADAMS (Accession Number ML14108AD25). Additionally, AREVA/TN document DI-19885-01 (Rev. 1), NAPS Units 1 & 2 ISFSI SAR, was also requested. This document was submitted previously to the NRC in a Dominion letter dated November 19, 2015 (Serial No. 15-369F). All information in Attachment 1 has been determined by AREVA/TN to be proprietary and an affidavit pursuant to 10 CFR 2.390 attesting to this determination is included in Attachment 2.

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If you have any questions or require additional information, please contact Mr. Thomas Szymanski at (804) 273-3065.

Sincerely,

David A. Heacock President and Chief Nuclear Officer Virginia Electric and Power Company

COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by David A. Heacock, who is President and Chief Nuclear Officer 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 28th day of	December, 2015.
My Commission Expires: 123116	
CRAIG D SLY Notary Public Commonwealth of Virginia Reg. # 7518653 My Commission Expires December 31, 20 16	Notary Public

Commitments made in this letter: None

Attachment 1: Requested Structural Information Related to HBU Cask

Attachment 2: AREVA / TN Affidavit

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

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

Mr. John N. Nguyen (w/ attachment) 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 attachment) Old Dominion Electric Cooperative Innsbrook Corporate Center, Suite 300 4201 Dominion Blvd. Glen Allen, Virginia 23060

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

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ATTACHMENT 1

Requested Structural Information Related to HBU Cask:

- AREVA TN 19885-0101, Rev. 2, Design Criteria Document
- Calculation 19885-0202, Rev. 0
- Calculation 1049-6, Rev. 1
- Calculation 1049-25, Rev. 0
- Drawing 19885-30-1, Rev. 0
- Drawing 19885-30-2, Rev. 0
- Drawing 19885-30-3, Rev. 0
- Drawing 19885-30-4, Rev. 0*
- Drawing 19885-30-8, Rev. 0

*NOTE: The original NRC request asked for drawing 19885-30-5. This drawing number was originally reserved for lid modification details, but was never used. All lid modification details are found on drawing 19885-30-4, Rev. 0.

North Anna Power Station ISFSI

Virginia Electric and Power Company

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ATTACHMENT 2

AREVA / TN Affidavit

North Anna Power Station ISFSI

Virginia Electric and Power Company

AFFIDAVIT PURSUANT TO 10 CFR 2.390

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

I, Jayant Bondre, 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:

- Document 19885-0101, Revision 2
- Calculation 19885-0202, Revision 0
- Calculation 1049-6, Revision 1
- Calculation 1049-25, Revision 0
- Drawing 19885-30-1, Revision 0
- Drawing 19885-30-2, Revision 0
- Drawing 19885-30-3, Revision 0
- Drawing 19885-30-4, Revision 0
- Drawing 19885-30-8, Revision 0

These documents 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.

- The information sought to be withheld from public disclosure involves documents (design criteria document, structural models and analyses and drawings) related to 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.

Attachment to Letter E-44029

Further the deponent sayeth not.

Javant Bondre

Vice President, AREVA Inc.

Subscribed and sworn before me this 11th day of December, 2015.

Notary Public-My Commission Expires

KELLY ZIMMERMAN NOTARY PUBLIC FREDERICK COUNTY, MARYLAND MY COMMISSION EXPIRES July 08, 2019