

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

~~PROPRIETARY INFORMATION WITHHOLD UNDER 10 CFR 2.390~~

February 4, 2016

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

Serial No. 15-369I  
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**  
**SUPPLEMENTAL INFORMATION**

On August 24, 2015, Virginia Electric and Power Company (Dominion) requested an amendment (ADAMS 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 January 21, 2016, NRC Senior Project Manager John Nguyen requested the attached calculations referenced in the above submittal. The requested material was subsequently supplied to Dominion by AREVA/TN. The calculations in Attachment 1 were determined by AREVA/TN to be proprietary as attested to in the affidavit provided in Attachment 2.

NM5526

**ATTACHMENT 1 CONTAINS INFORMATION THAT IS BEING ~~WITHHELD~~**  
**~~FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390. UPON SEPARATION~~**  
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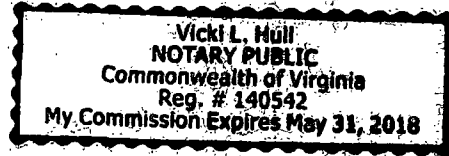
~~PROPRIETARY INFORMATION WITHHOLD UNDER 10 CFR 2.390~~

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

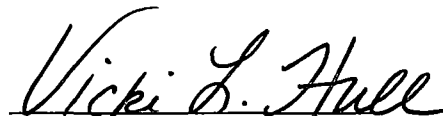


COMMONWEALTH OF VIRGINIA            )  
  )  
COUNTY OF HENRICO                    )

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 4<sup>TH</sup> day of February, 2016.

My Commission Expires: May 31, 2018.

  
Notary Public

Commitments made in this letter: None

Attachment 1: Requested AREVA/TN Calculations Related to HBU Cask

Attachment 2: AREVA/TN Affidavit for Information Contained in Attachment 1

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

cc: U.S. Nuclear Regulatory Commission (w/o Attachment 1)  
Region II  
Marquis One Tower  
245 Peachtree Center Avenue, NE Suite 1200  
Atlanta, Georgia 30303-1257

NRC Senior Resident Inspector (w/o Attachment 1)  
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 Attachment 1)  
Old Dominion Electric Cooperative  
Innsbrook Corporate Center, Suite 300  
4201 Dominion Blvd.  
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  
Room 730  
Richmond, Virginia 23219

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ATTACHMENT 1

Requested AREVA/TN Calculations Related to HBU Cask

- Calculation 1066-6, Rev. 3, Short Term Normal Thermal Analysis
- Calculation 1066-17, Rev. 1, Fire Accident Analysis, TN-32 Cross-Section

North Anna Power Station ISFSI  
Virginia Electric and Power Company

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~~PROPRIETARY INFORMATION WITHHOLD UNDER 10 CFR 2.390~~

Serial No. 15-3691  
Docket No. 72-16

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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THIS PAGE IS DECONTROLLED.~~



January 27, 2016  
E-44318 Rev. 0

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

**Subject: Request for Select 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 documents 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 and are identified as follows:

1066-006 Rev. 3  
1066-017 Rev. 1

Sincerely,

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

Tom Edwards  
Design Project Engineer

cc: Phil Lozmack (PM) Adam Jones (PM)  
Todd Young (QAS) Lauren Naggs (DCA)  
Dennis Williford (Licensing) Project File 19885 – Outgoing Correspondence

**AREVA TN**

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AREVA Inc.  
7135 Minstrel Way - Suite 300 - Columbia, MD 21045 USA  
Tel.: (410) 910-6900 - Fax: (410) 910-6902  
[us.aveva.com/AREVATN](http://us.aveva.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 1066-6, Revision 3
- Calculation 1066-17, Revision 1

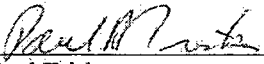
These documents have been appropriately designated as proprietary.

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.

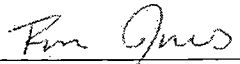
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves calculations (thermal analyses for normal and accident conditions) 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 methodology associated with the thermal analyses 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 27th day of January, 2016.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires \_\_\_/\_\_\_/\_\_\_