

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

~~PROPRIETARY INFORMATION WITHOLD UNDER 10 CFR 2.390~~

April 21, 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. 16-055A  
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**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION 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). This initial submittal was subsequently supplemented several times (see References) in response to NRC requests for supporting information.

On January 15, 2016, Dominion received a Request for Additional Information (RAI) (ADAMS Accession Nos. ML 16019A206 / letter, ML 16019A209 / enclosure) pertaining to the High Burn-up Dry Cask Research and Development Project. On March 22, 2016, Dominion responded to the RAI (ADAMS Accession No. ML 16089A092), and indicated that additional proprietary information would be sent by a separate letter. The additional proprietary information is provided in Attachments 1, 2, and 3. Attachment 1 contains information that has been determined by AREVA/TN to be proprietary in its entirety, therefore a non-proprietary version of these documents has not been provided. Attachment 2 contains the TN-32B HBU Demonstration Cask Design/Licensing Basis Document (TN-32B DLBD) that was prepared by AREVA/TN. Attachment 3 contains enlargements of certain drawings in the TN-32B DLBD. AREVA/TN is requesting that Attachments 1, 2, and 3 be withheld from public disclosure in accordance with 10 CFR 2.390, as they are proprietary. In support of the request to withhold Attachments 1, 2, and 3, an affidavit has been prepared by AREVA/TN and is provided as Attachment 4. A non-proprietary version of the TN-32B DLBD is provided in Attachment 5.

**ATTACHMENTS 1, 2, AND 3 CONTAIN INFORMATION THAT IS BEING WITHHELD  
FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390. UPON SEPARATION THIS  
LETTER IS DECONTROLLED.**

NM5520  
NM5524

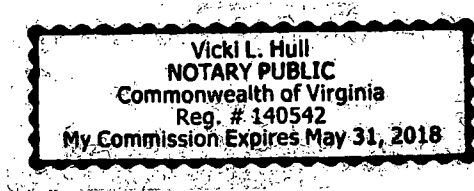
In addition to being withheld from the public for proprietary reasons, the drawings in Attachments 2 and 3 have also been identified by AREVA/TN as containing security related information. Therefore it is requested that these drawings also be withheld from public disclosure in accordance with 10 CFR 2.390 as security related information.

On April, 11, 2016, NRC Project Manager Mr. William Allen requested Technical Specification page 3.3.3-1 be re-submitted with a change bar deleted that Dominion configuration management software had added to the entire right side of that page. The altered page is included as Attachment 6.

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 21<sup>ST</sup> day of April, 2016.

My Commission Expires: 5-31-18 Vicki L. Hull  
Notary Public

References:

1. Dominion Letter No. 15-369A, dated 10/08/15 (ADAMS Accession No. ML 15289A189)
2. Dominion Letter No. 15-369C, dated 11/18/15 (ADAMS Accession No. ML 15328A483)
3. Dominion Letter No. 15-369D, dated 11/19/15 (ADAMS Accession No. ML 15331A132)
4. Dominion Letter No. 15-369E, dated 12/01/15 (ADAMS Accession No. ML 15342A065)
5. Dominion Letter No. 15-369F, dated 11/19/15 (ADAMS Accession No. ML 16022A073)

**ATTACHMENTS 1, 2, AND 3 CONTAIN INFORMATION THAT IS BEING WITHHELD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390. UPON SEPARATION THIS LETTER IS DECONTROLLED.**

6. Dominion Letter No. 15-369G, dated 12/28/15 (Proprietary)
7. Dominion Letter No. 15-369H, dated 01/14/16 (ADAMS Accession No. ML 16019A335)
8. Dominion Letter No. 15-369I, dated 02/04/16 (ADAMS Accession No. ML 16043A371)

Attachments:

1. Additional Proprietary Material supporting RAI Responses Related to HBU Cask (Proprietary)
2. TN-32B DLBD (Proprietary)
3. Large format TN-32B DLBD Drawings (Proprietary)
4. AREVA/TN Affidavit
5. TN-32B DLBD (Non-proprietary)
6. Requested TS Page 3.3.3-1 (change bar deletion)

Commitments made in this letter: None

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. William Allen  
Senior Project Manager  
U. S. Nuclear Regulatory Commission  
Two White Flint North, Mail Stop 4 B34  
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 – 7<sup>th</sup> Floor  
109 Governor Street, Room 730  
Richmond, Virginia 23219

**ATTACHMENTS 1, 2, AND 3 CONTAIN INFORMATION THAT IS BEING WITHHELD  
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**ATTACHMENT 6**

Requested TS Page 3.3.3-1 (change bar deletion)

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

3.3 SSSC RADIATION PROTECTION

3.3.3 SSSC Surface Contamination

- LCO 3.3.3 Removable contamination on the SSSC exterior surfaces shall not exceed:
- a. 1000 dpm/100 cm<sup>2</sup> from beta and gamma sources; and
  - b. 20 dpm/100 cm<sup>2</sup> from alpha sources.

APPLICABILITY: During LOADING OPERATIONS.

ACTIONS

----- NOTE -----  
Separate Condition entry is allowed for each SSSC.  
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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. SSSC removable surface contamination limits not met.	A.1 Restore SSSC removable surface contamination to within limits.	Prior to TRANSPORT OPERATIONS

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.3.3.1 Verify that the removable contamination on exterior surfaces of SSSC containing fuel assemblies is within limits.	Prior to TRANSPORT OPERATIONS