

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

~~PROPRIETARY INFORMATION WITHHOLD UNDER 10 CFR 2.390~~

July 26, 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. 16-055C  
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**  
**REVISED 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 (HBU) 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 subsequently furnished additional proprietary information on April 21, 2016 (ADAMS Accession No. ML16118A206).

On May 26, 2016, during a teleconference with the NRC, Project Manager Mr. William Allen requested the submittal of several calculations and a design criteria matrix to support the NRC's review of the HBU cask project submittals outlined above. That information was submitted on June 21, 2016 (ADAMS Accession No. ML16176A239).

Two documents that were provided to the NRC for the High Burnup Cask project have been revised due to minor changes in manufacturing due to issues identified during fit-up testing with the top nozzles, thermocouple lances, and thermocouple sleeve. Specifically, the following have been revised:

- Calculation 19885-0206, Rev. 1, TN-32B HBU, Vent, Drain and Other Miscellaneous Lid Closure Evaluations (originally submitted in ADAMS Accession No. ML15331A132) and

NMSS20  
NMSS26

- Drawing 19885-30-4, Rev. 2, TN-32B HBU Demonstration Cask Lid Assembly and Parts List (originally submitted in ADAMS Accession No. ML16004A108 and revised in ADAMS Accession No. ML16118A206).

The jacking plate (I/N 19885-30-4-23) and the retaining plate (I/N 19885-30-4-22) have been found to bind in the internal diameter (ID) of the thermocouple sleeve. Because of the thermocouple cable lengths, these plates also need to be installed with the thermocouple lance assembly.

During the small component testing, it was determined that these plates fit too tightly in the recess, and would result in excessive radiation exposure during installation of the lance assemblies at NAPS. Additionally, the ID of the plates has been increased to allow clearance for the installation tool.

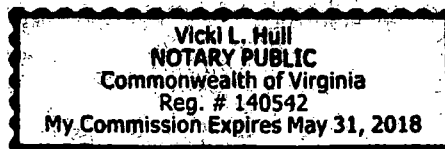
The revised calculation and drawing are provided in Attachment 1. Attachment 1 contains information that has been determined by AREVA/TN to be proprietary in its entirety, therefore a non-proprietary version of these documents has not been provided. AREVA/TN is requesting that Attachment 1 be withheld from public disclosure in accordance with 10 CFR 2.390, as the calculation and drawing are proprietary. In support of the request to withhold Attachment 1, an affidavit has been prepared by AREVA/TN and is provided as Attachment 2.

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 26<sup>TH</sup> day of July, 2016.

My Commission Expires: May 31, 2018 Vicki L. Hull  
Notary Public

References:

1. Dominion Letter No. 15-369A, dated 10/08/15 (ADAMS Accession No. ML15289A189)
2. Dominion Letter No. 15-369C, dated 11/18/15 (ADAMS Accession No. ML15328A483)
3. Dominion Letter No. 15-369D, dated 11/19/15 (ADAMS Accession No. ML15331A132)
4. Dominion Letter No. 15-369E, dated 12/01/15 (ADAMS Accession No. ML15342A065)
5. Dominion Letter No. 15-369F, dated 11/19/15 (ADAMS Accession No. ML16022A073)
6. Dominion Letter No. 15-369G, dated 12/28/15 (ADAMS Accession No. ML16004A108)
7. Dominion Letter No. 15-369H, dated 01/14/16 (ADAMS Accession No. ML16019A335)
8. Dominion Letter No. 15-369I, dated 02/04/16 (ADAMS Accession No. ML16043A371)
9. Dominion Letter No. 16055, dated 03/22/16 (ADAMS Accession No. ML16089A092)
10. Dominion Letter No. 16-055A, dated 04/21/16 (ADAMS Accession No. ML16118A206)
11. Dominion Letter No. 16-055B, dated 06/21/16 (ADAMS Accession No. ML16176A239)

Attachments:

1. Revised Calculation and Drawing Related to HBU Cask (Proprietary)
2. AREVA/TN Affidavit

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

Serial No. 16-055C  
Docket No. 72-16

**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 Montgomery )

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:

- Calculation 19885-0206, Revision 1
- Drawing 19885-30-4, Revision 2

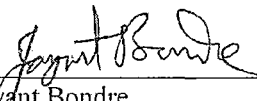
These documents have been appropriately designated as proprietary.

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.

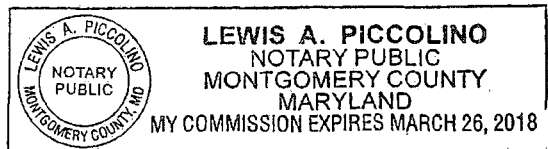
- 1) The information sought to be withheld from public disclosure involves documents (design analyses) related to the design of the modified TN-32B dry storage cask (High Burnup Fuel Cask Demonstration Project), which are owned and have been held in confidence by AREVA Inc.
- 2) The information is of 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.

Further the deponent sayeth not.

  
Jayant Bondre  
Vice President, AREVA Inc.

Subscribed and sworn before me this 15<sup>th</sup> day of July, 2016.

  
Notary Public  
My Commission Expires 03/26/2018



ATTACHMENT 1

**Revised Calculation and Drawing Related to HBU Cask (Proprietary)**

Attachment 1 provides the following specific documents:

- AREVA/TN Calculation 19885-0206, Rev. 1
- AREVA/TN Drawing 19885-30-4, Rev. 2

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

~~ATTACHMENT 1 CONTAINS INFORMATION THAT IS BEING WITHHELD FROM  
PUBLIC DISCLOSURE UNDER 10 CFR 2.390. UPON SEPARATION THIS PAGE IS  
DECONTROLLED.~~