VIRGINIA ELECTRIC AND POWER COMPANY Richmond, Virginia 23261

PROPRIETARY INFORMATION – WITHHOLD UNDER 10 CFR 2.390

July 19, 2017

10 CFR 50.90

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555 Serial No.:16-383ANRA/DEAR0Docket Nos.:50-338/339License Nos.:NPF-4/7

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION) NORTH ANNA POWER STATION UNITS 1 AND 2 PROPOSED LICENSE AMENDMENT REQUEST FOR SPENT FUEL STORAGE AND NEW FUEL STORAGE ANNOTATED PROPRIETARY ATTACHMENT WITH JUSTIFICATION FOR CLAIMING INFORMATION AS PROPRIETARY

By letter dated May 2, 2017, Dominion submitted a license amendment request to revise Technical Specifications (TS) 3.7.18, "Spent Fuel Pool Storage" and TS 4.3.1 "Criticality." Conforming changes were proposed to Technical Specifications Bases (TSB) B3.7.18. A supporting criticality safety evaluation for fuel assembly storage in the North Anna Power Station (NAPS) Spent Fuel Pool (SFP) storage racks and the New Fuel Storage Racks (NFSR) was performed for the proposed TS change. A proprietary version of the Criticality Safety Evaluation Report was provided as Attachment 6 to the proposed license amendment request. However, although each page of Attachment 6 was identified as proprietary, the information which was proprietary was not contained within brackets and the reason for claiming the information as proprietary was not indicated. Enclosure 1 provides an annotated version of Attachment 6 which identifies proprietary information in brackets along with the reason for claiming the information the information as proprietary. Change bars are also included in the right margin to help identify where the annotations were added.

Information provided in the Enclosures to this letter is summarized below:

- Enclosure 1 provides an annotated version of Attachment 6, Criticality Safety Evaluation Report (Proprietary).
- Enclosure 2 contains the Affidavit of AREVA NP, Inc. (AREVA) for withholding proprietary information from public disclosure.
- Enclosure 3 contains the Westinghouse Electric Company, LLC (Westinghouse) application for withholding proprietary information from public disclosure CAW-16-4510 and accompanying affidavit. (Westinghouse information only)
- Enclosure 4 contains the Affidavit of Electric Power Research Institute, Inc. (EPRI) and AREVA for withholding proprietary information from public disclosure.

Enclosure 1 contains information that is being withheld from public disclosure under 10 CFR 2.390. Upon separation from Enclosure 1, this letter is decontrolled.

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The associated Affidavits for withholding proprietary information from public disclosure were included in the original license amendment submittal as Attachments 8 thru 11 and are included as Enclosures 2 through 5, respectively, as indicated above.

Since Enclosure 1 (the annotated version of Attachment 6) contains information proprietary to AREVA NP, Inc. (AREVA), Westinghouse, and EPRI, it is supported by affidavits signed by the owners of the information. The affidavits set forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390.

Accordingly, it is respectfully requested that the proprietary information be withheld from public disclosure in accordance with 10 CFR 2.390.

Should you have any questions in regard to this submittal, please contact Diane E. Aitken at (804) 273-2694.

Sincerely,

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Mark D. Sartain Vice President – Nuclear Engineering and Fleet Support

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 and Fleet Support 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 19th day of July 2017. My Commission Expires: <u>August 31, 2019</u>. ublic GARY DON MILLER Commitments made in this letter: None **Notary Public** Commonwealth of Virginia Reg. # 7629412 My Commission Expires August 31, 201

Enclosures:

- 1. Annotated version of Attachment 6, Criticality Safety Evaluation Report (Proprietary).
- 2. Affidavit of AREVA NP, Inc.
- 3. Affidavit of Westinghouse Electric Company, LLC (Westinghouse information only)
- 4. Affidavit of Electric Power Research Institute, Inc. and AREVA
- 5. Affidavit of Westinghouse Electric Company, LLC (regarding information co-owned with EPRI)

cc: U.S. Nuclear Regulatory Commission – Region II Marquis One Tower 245 Peachtree Center Avenue, NE Suite 1200 Atlanta, GA 30303-1257

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