

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

10 CFR 50
10 CFR 51
10 CFR 54

October 15, 2018

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Serial No.: 18-340
NRA/DEA: R4
Docket Nos.: 50-280/281
License Nos.: DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
APPLICATION FOR SUBSEQUENT RENEWED OPERATING LICENSES

Pursuant to 10 CFR Parts 50, 51, and 54, Virginia Electric and Power Company (Dominion Energy Virginia) is submitting this Application for Subsequent Renewed Operating Licenses for Surry Power Station (SPS) Units 1 and 2. The existing Renewed Facility Operating Licenses, Nos. DPR-32 and DPR-37 for SPS Units 1 and 2, respectively, currently expire as follows:

- At midnight on May 25, 2032 for Unit 1
- At midnight on January 29, 2033 for Unit 2

Dominion Energy Virginia seeks to extend the respective operating terms by 20 years beyond the current renewed license expiration dates.

The enclosed Subsequent License Renewal Application (SLRA) contains the information required by 10 CFR Parts 54 and 51 and meets the submittal timeliness requirements of 10 CFR 54.17(c) and 10 CFR 2.109(b).

As required by 10 CFR 54.21(b), current licensing basis changes which have a material effect on the content of this application will be submitted at least annually while the application is under NRC review and at least three months prior to the scheduled completion of the NRC review.

Appendix A, Table A4.0-1, of the enclosed SPS SLRA provides a list of commitments made in this application. This list will be updated as required throughout the SLRA review process.

In accordance with 10 CFR Part 50, Appendix H, and NUREG-2192, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants," an update to the reactor surveillance capsule withdrawal schedule addressing the subsequent period of extended operation is included within this submittal, for NRC approval. The capsule withdrawal schedule is provided in the Reactor Vessel Material Surveillance program, as shown in SLRA Section B.2.1.19.

The Application for Subsequent Renewed Operating Licenses for SPS Units 1 and 2 consists of the following five Enclosures:

- Enclosure 1: Surry Power Station Subsequent License Renewal Application Enclosure Summary
- Enclosure 2: Applications for Withholding Proprietary Information from Public Disclosure Pursuant to 10 CFR 2.390

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N.R.

**Enclosure 5 contains information that is being withheld from public disclosure under 10 CFR 2.390.
Upon separation from Enclosure 5, this letter is decontrolled.**

Commitments made in this letter:

The Licensee Commitments identified in Table A4.0-1 of Appendix A, Final Safety Analysis Report Supplement, are proposed to support approval of the subsequent renewed operating licenses and may change during the NRC review period.

Enclosures:

Enclosure 1 – SPS Subsequent License Renewal Application Enclosure Summary

Enclosure 2 – Applications for Withholding Proprietary Information from Public Disclosure Pursuant to 10 CFR 2.390

Attachment 1 – Framatome Affidavit for Topical Reports ANP-3679P, Revision 0 and ANP-3680P, Revision 0

Attachment 2 – CAW-18-4762, Affidavit for PWROG-17033-P, Revision 1

Enclosure 3 – Surry Power Station Subsequent License Renewal Application (CD-ROM titled: "SPS_SLRA")

Enclosure 4 – Non-proprietary Reference Documents and Redacted Versions of Proprietary Reference Documents (Public Version)

Attachment 1 – ANP-3679NP, Revision 0

Attachment 2 – ANP-3680NP, Revision 0

Attachment 3 – PWROG-17033-NP, Revision 1

Attachment 4 – PWROG-17011-NP, Revision 1

Attachment 5 – PWROG-17031-NP, Revision 1

Attachment 6 – PWROG-17090-NP, Revision 0

Enclosure 5 – 10 CFR 2.390 Withheld Proprietary Documents

Attachment 1 – ANP-3679P, Revision 0

Attachment 2 – ANP-3680P, Revision 0

Attachment 3 – PWROG-17033-P, Revision 1

cc: (w/o Attachments, CD-ROM copy only)

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Surry Power Station

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Mr. Sanford B. Wanner, Administrator
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Surry, VA 23883

Enclosure 1

SURRY POWER STATION SUBSEQUENT LICENSE RENEWAL APPLICATION
ENCLOSURE SUMMARY

**Virginia Electric and Power Company
(Dominion Energy Virginia)
Surry Power Station Units 1 and 2**

ENCLOSURE SUMMARY

Enclosure 1 – Surry Power Station Subsequent License Renewal Application
Enclosure Summary

Enclosure 2 – Applications for Withholding Proprietary Information from Public
Disclosure Pursuant to 10 CFR 2.390

Attachment 1 – Framatome Affidavit for Topical Reports

- i. ANP-3679P, Revision 0, "Low Upper-Shelf Toughness Fracture Mechanics Analysis of Surry Units 1 and 2 Reactor Vessels for Levels A & B Service Loads at 80 Years" (Enclosure 5, Attachment 1)
- ii. ANP-3680P, Revision 0, "Low Upper-Shelf Toughness Fracture Mechanics Analysis of Surry Units 1 and 2 Reactor Vessels for Levels C & D Service Loads at 80 Years" (Enclosure 5, Attachment 2)

Attachment 2 – CAW-18-4762, Affidavit for PWROG-17033-P, Revision 1, "Update for Subsequent License Renewal: WCAP-13045, Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems" (Enclosure 5, Attachment 3)

Enclosure 3 – Surry Power Station Subsequent License Renewal Application
(CD-ROM titled: "SPS_SLRA")

Enclosure 4 – Non-proprietary Reference Documents and Redacted Versions of
Proprietary Reference Documents (Public Version)

- a. **Attachment 1** – ANP-3679NP, Revision 0, "Low Upper-Shelf Toughness Fracture Mechanics Analysis of Surry Units 1 and 2 Reactor Vessels for Levels A & B Service Loads at 80 Years"
- b. **Attachment 2** – ANP-3680NP, Revision 0, "Low Upper-Shelf Toughness Fracture Mechanics Analysis of Surry Units 1 and 2 Reactor Vessels for Levels C & D Service Loads at 80 Years"
- c. **Attachment 3** – PWROG-17033-NP Revision 1, "Update for Subsequent License Renewal: WCAP-13045, Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems"
- d. **Attachment 4** – PWROG-17011-NP, Revision 1, "Update for Subsequent License Renewal: WCAP-14535A, Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination and

WCAP-15666-A, Extension of Reactor Coolant Pump Motor Flywheel Examination”

- e. **Attachment 5** – PWROG-17031-NP, Revision 1, “Update for Subsequent License Renewal: WCAP-15338-A, A Review of Cracking Associated with Weld Deposited Cladding in Operating PWR Plants”
- f. **Attachment 6** – PWROG-17090-NP, Revision 0, “Generic Rotterdam Forging and Weld Initial Upper-Shelf Energy Determination”

Enclosure 5 – 10 CFR 2.390 Withheld Proprietary Documents

- a. **Attachment 1** – ANP-3679P, Revision 0, “Low Upper-Shelf Toughness Fracture Mechanics Analysis of Surry Units 1 and 2 Reactor Vessels for Levels A & B Service Loads at 80 Years”
- b. **Attachment 2** – ANP-3680P, Revision 0, “Low Upper-Shelf Toughness Fracture Mechanics Analysis of Surry Units 1 and 2 Reactor Vessels for Levels C & D Service Loads at 80 Years”
- c. **Attachment 3** – PWROG-17033-P Revision 1, “Update for Subsequent License Renewal: WCAP-13045, Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems”

Enclosure 2

**APPLICATIONS FOR WITHHOLDING PROPRIETARY INFORMATION FROM
PUBLIC DISCLOSURE PURSUANT TO 10 CFR 2.390**

**Virginia Electric and Power Company
(Dominion Energy Virginia)
Surry Power Station Units 1 and 2**

**Enclosure 2
Attachment 1**

**FRAMATOME AFFIDAVIT FOR TOPICAL REPORTS
ANP-3679P, REVISION 0 AND ANP-3680P, REVISION 0**

**Virginia Electric and Power Company
(Dominion Energy Virginia)
Surry Power Station Units 1 and 2**

4. These Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by FRAMATOME Inc. and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by FRAMATOME Inc. to determine whether information should be classified as proprietary:

- (a) The information reveals details of FRAMATOME Inc.'s research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FRAMATOME Inc.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FRAMATOME Inc. in product optimization or marketability.

- (e) The information is vital to a competitive advantage held by FRAMATOME Inc., would be helpful to competitors to FRAMATOME Inc., and would likely cause substantial harm to the competitive position of FRAMATOME Inc.

The information in these Documents is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c) and 6(d) above.

7. In accordance with FRAMATOME Inc.'s policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside FRAMATOME Inc. only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FRAMATOME Inc. policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Phil C. Gaud

SUBSCRIBED before me this 14
day of June, 2017.

Heidi H Elder

Heidi Hamilton Elder
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 12/31/2022
Reg. # 7777873

HEIDI HAMILTON ELDER
NOTARY PUBLIC
REGISTRATION # 7777873
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES
DECEMBER 31, 2022

**Enclosure 2
Attachment 2**

CAW-18-4762, AFFIDAVIT FOR PWR-17033-P, REVISION 1

**Virginia Electric and Power Company
(Dominion Energy Virginia)
Surry Power Station Units 1 and 2**



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CAW-18-4762

June 12, 2018

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: PWROG-17033-P Revision 1 "Update for Subsequent License Renewal: WCAP-13045,
"Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse
Type Nuclear Steam Supply Systems" (Proprietary)

The Application for Withholding Proprietary Information from Public Disclosure is submitted by Westinghouse Electric Company LLC ("Westinghouse"), pursuant to the provisions of paragraph (b)(1) of Section 2.390 of the Nuclear Regulatory Commission's ("Commission's") regulations. It contains commercial strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary information for which withholding is being requested in the above subject report is further identified in Affidavit CAW-18-4762 signed by the owner of the proprietary information, Westinghouse. The Affidavit, which accompanies this letter, sets 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 Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by the Pressurizer Water Reactor Owners Group (PWROG).

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-18-4762 and should be addressed to James A. Gresham, Consulting Engineer, Licensing and Regulatory Affairs, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 2 Suite 259, Cranberry Township, Pennsylvania 16066.

Paul A. Russ, Director
Licensing and Regulatory Affairs

- Enclosures: 1) Affidavit CAW-18-4762
2) Proprietary Information Notice and Copyright Notice
3) PWROG-17033-P, Update for Subsequent License Renewal: WCAP-13045, "Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems"
4) PWROG-17033-NP, Update for Subsequent License Renewal: WCAP-13045, "Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems"

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

I, Paul A. Russ, am authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC ("Westinghouse") and declare that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

Executed on:

6/13/18



Paul A. Russ, Director
Licensing and Regulatory Affairs

- (1) I am Director, Licensing and Regulatory Affairs, Westinghouse Electric Company LLC (“Westinghouse”), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Nuclear Regulatory Commission’s (“Commission’s”) regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) 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 should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitute Westinghouse policy and provide the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage (e.g., by optimization or improved marketability).
 - (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
 - (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
 - (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
 - (f) It contains patentable ideas, for which patent protection may be desirable.
- (iii) There are sound policy reasons behind the Westinghouse system which include the following:
- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
 - (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
 - (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, is to be received in confidence by the Commission.
- (v) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in Enclosure 3 to CAW-18-4762, PWROG-17033-P Revision 1 "Update for Subsequent License Renewal: WCAP-13045, "Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems" (Proprietary), for submittal to the Commission, being transmitted by OG-18-142 letter. The proprietary information as submitted by Westinghouse is that associated with reactor coolant loop pump casing fracture mechanics integrity evaluations for the subsequent license renewal program (80 years of service), and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to perform reactor coolant loop pump casing fracture mechanics integrity evaluations for the subsequent license renewal program (80 years of service).
- (b) Further, this information has substantial commercial value as follows:
- (i) Westinghouse plans to sell the use of similar information to its customers for the purpose of performing reactor coolant loop pump casing fracture mechanics integrity evaluations for the subsequent license renewal program (80 years of service).
 - (ii) Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
 - (iii) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith CAW-18-4762 are proprietary and non-proprietary versions of a document, furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the Affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

COPYRIGHT NOTICE

The reports transmitted herewith CAW-18-4762 each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

Pressurizer Water Reactor Owners Group (PWROG)

Letter for Transmittal to the NRC

The following paragraphs should be included in your letter to the NRC Document Control Desk:

Enclosed are:

1. PWROG-17033-P Revision 1 "Update for Subsequent License Renewal: WCAP-13045, "Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems" (Proprietary)
2. PWROG-17033-NP Revision 1 "Update for Subsequent License Renewal: WCAP-13045, "Compliance to ASME Code Case N-481 of the Primary Loop Pump Casings of Westinghouse Type Nuclear Steam Supply Systems" (Non-Proprietary)

Also enclosed are the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-18-4762, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice.

As Item 1 contains information proprietary to Westinghouse Electric Company LLC ("Westinghouse"), it is supported by an Affidavit signed by Westinghouse, the owner of the information. The Affidavit sets forth the basis on which the information may be withheld from public disclosure by the Nuclear Regulatory Commission ("Commission") and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-18-4762 and should be addressed to James A. Gresham, Consulting Engineer, Licensing and Regulatory Affairs, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 2 Suite 259, Cranberry Township, Pennsylvania 16066.

Enclosure 3

SURRY POWER STATION SUBSEQUENT LICENSE RENEWAL APPLICATION
(CD-ROM TITLED: "SPS_SLRA")

**Virginia Electric and Power Company
(Dominion Energy Virginia)
Surry Power Station Units 1 and 2**