

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

July 9, 2019

10 CFR 50.90

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

Serial No.: 19-083
NRA/GDM: R1
Docket Nos.: 50-338/339
50-280/281
License Nos.: NPF-4/7
DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2
PROPOSED LICENSE AMENDMENT REQUESTS
ADDITION OF ANALYTICAL METHODOLOGY TO THE CORE OPERATING LIMITS
REPORT FOR A SMALL BREAK LOSS OF COOLANT ACCIDENT (SBLOCA)
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND ANALYSIS
ERROR CORRECTION

By letters dated July 12, 2018 and July 31, 2018 [Agencywide Document Access and Management System (ADAMS) Accession Nos. ML 18198A118 and ML 18218A170, respectively], Virginia Electric and Power Company (Dominion Energy Virginia) submitted license amendment requests (LARs) to revise the Technical Specifications (TS) for North Anna and Surry Power Stations (NAPS and SPS) Units 1 and 2, respectively, to allow each station to implement a fuel vendor-independent evaluation model for analyzing hypothetical small break loss-of-coolant accidents.

As part of its review of the LARs, the U. S. Nuclear Regulatory Commission (NRC) staff conducted an audit at the Dominion Energy Virginia corporate offices in Glen Allen, Virginia, from October 1-4, 2018. During the course of the audit, the NRC staff presented Dominion Energy Virginia staff with a detailed list of issues requiring further information. An audit summary report was issued on October 25, 2018.

The NRC staff completed its initial review of the LARs and of information provided during the audit and has determined that additional information is needed to complete its evaluation. The NRC request for additional information (RAI) and Dominion Energy Virginia's response to the RAI are provided in Attachment 1. In addition, subsequent to the submittal of the NAPS and SPS LARs, an error was identified in Framatome Reports ANP-3467P and ANP-3676P for NAPS and SPS, respectively. A description of the error correction is also provided in Attachment 1 immediately following the RAI responses.

Attachment 1 contains information proprietary to Framatome and is therefore supported by an affidavit signed by the owner of the information. The affidavit 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

*ADD
NRR*

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

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. A redacted, non-proprietary version of the information is provided in Attachment 2. The affidavit is provided in Attachment 5.

The response to NRC RAI No. 1 required a minor change to the proposed TS pages for the NAPS and SPS TS. The revised marked-up and typed TS pages for NAPS and SPS are provided in Attachments 3 and 4, respectively. The additional change is indicated by double revision bars in the right hand margin of the typed TS pages provided in Attachment 4.

The information provided in this letter does not affect the conclusions of the significant hazards considerations or the environmental assessments included in the July 12, 2018 and July 31, 2018 LARs.

If there are any questions or if additional information is needed, please contact Mr. Gary D. Miller at (804) 273-2771.

Sincerely,



Gerald T. Bischof
 Senior Vice President – Nuclear Operations and Fleet Performance

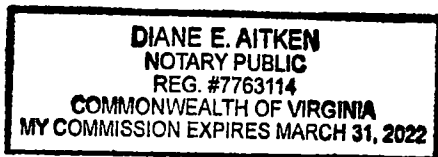
Commitments made in this letter: None

COMMONWEALTH OF VIRGINIA)
)
 COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gerald T. Bischof, who is Senior Vice President – Nuclear Operations and Fleet Performance 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 9th day of July, 2019.

My Commission Expires: March 31, 2022




 Notary Public

Attachments:

1. Response to NRC Request for Additional Information and Correction of SBLOCA Analysis Error (**Proprietary**)
2. Response To NRC Request for Additional Information and Correction of SBLOCA Analysis Error (Non-proprietary)
3. Revised Marked-up NAPS and SPS Technical Specifications Pages
4. Revised Typed NAPS and SPS Technical Specifications Pages
5. Framatome Affidavit for Withholding Proprietary Information

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

NRC Senior Resident Inspector
North Anna Power Station

NRC Senior Resident Inspector
Surry Power Station

Ms. Karen R. Cotton Gross
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop 08 G-9A
11555 Rockville Pike
Rockville, Maryland 20852-2738

Mr. G. Edward Miller
NRC Senior Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop 09 E-3
11555 Rockville Pike
Rockville, Maryland 20852-2738

Mr. Marcus Harris
Old Dominion Electric Cooperative
Innsbrook Corporate Center, Suite 300
4201 Dominion Blvd.
Glen Allen, Virginia 23060

State Health Commissioner
Virginia Department of Health
James Madison Building – 7th Floor
109 Governor Street
Room 730
Richmond, Virginia 23219

Attachment 1

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION

AND

CORRECTION OF SBLOCA ANALYSIS ERROR

(PROPRIETARY)

**Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna and Surry Power Stations Units 1 and 2**

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

Attachment 5

FRAMATOME AFFIDAVIT FOR WITHHOLDING PROPRIETARY INFORMATION

**Virginia Electric and Power Company
(Dominion Energy Virginia)
North Anna and Surry Power Stations Units 1 and 2**

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Nathan E. Hottle. I am Manager, Product Licensing, for Framatome Inc. (Framatome) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by Framatome to determine whether certain Framatome information is proprietary. I am familiar with the policies established by Framatome to ensure the proper application of these criteria.

3. I am familiar with the Framatome information contained in the following document: Virginia Electric and Power Company Letter Number 19-083, "North Anna and Surry Power Stations Units 1 and 2 Proposed License Amendment Requests – Addition of Analytical Methodology to the Core Operating Limits Report for a Small Break Loss of Coolant Accident (SBLOCA) Response to Request for Additional Information and Error Correction" referred to herein as "Document." Information contained in this Document has been classified by Framatome as proprietary in accordance with the policies established by Framatome Inc. for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by Framatome and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document 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 to determine whether information should be classified as proprietary:

- (a) The information reveals details of Framatome'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.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Framatome.

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

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

8. Framatome 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.

Mark E. Hoyle

SUBSCRIBED before me this 25
day of June, 2019.

Heidi Hamilton Elder

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

