

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 23, 1992

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 92-684
NL&P: R3

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNIT 1
STEAM GENERATOR REPLACEMENT PROJECT
DESIGN CHANGE PACKAGE 90-13-1

A copy of the final version of the design change package (DCP) 90-13-1, "Steam Generator Repair" for replacement of the North Anna Unit 1 steam generators is enclosed for NRC information (Attachment 1). The attached document contains information which is proprietary to Bechtel Power Corporation (Bechtel). Accordingly, it is requested that this information be withheld from public disclosure.

The final version of DCP 90-13-1 also includes information proprietary to Westinghouse Electric Corporation (Westinghouse). There would be substantial cost to Virginia Electric and Power Company to have Westinghouse review and provide the necessary application letter and accompanying affidavit for withholding this proprietary information from public disclosure. Therefore, the Westinghouse proprietary information was removed from the enclosed copy of the DCP (Attachment 1) by Virginia Electric and Power Company. The majority of the Westinghouse proprietary information (which has been removed from the enclosed document) was previously provided to the NRC in the 70% draft DCP. Further, the Westinghouse proprietary information (removed from the enclosed document) remained substantially unchanged from the previously provided 70% draft to the final version. The final version of the DCP contains only one sentence regarding the strength of the tubesheet material and one additional appendix regarding the secondary side pressure test temperature which are considered Westinghouse proprietary information and that were not provided to the NRC in the 70% draft version.

In consideration of this additional cost without the benefit of providing additional pertinent information, Virginia Electric and Power Company will not include the Westinghouse proprietary information to the NRC with this submittal. However, as always, the complete final DCP is available for NRC review in the Virginia Electric and Power Company offices at the North Anna site and at the Innsbrook Technical Center.

The Bechtel proprietary information, which consists of a decontamination specification and several drawings, has not been removed from the attached copy of DCP 90-13-1. Therefore, enclosed herewith is a Bechtel application letter for withholding proprietary

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information with an accompanying affidavit (Attachment 2). The proprietary aspects of this information are supported by the affidavit signed by Bechtel, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the NRC and addresses the considerations listed in paragraph (b)(4) of 10 CFR Section 2.790. Accordingly, it is respectfully requested that the information which is proprietary to Bechtel be withheld from public disclosure in accordance with 10 CFR Section 2.790.

Correspondence with respect to the proprietary aspects of the items described in the Bechtel affidavit should be addressed to Mr. E. J. Reinsch, Vice President and Manager, Bechtel Power Corporation, 5801 Washingtonian Boulevard, Gaithersburg, Maryland 20878-5356.

For your convenience in preparing the enclosed DCP (Attachment 1) for public disclosure, non-proprietary versions of the decontamination specification and non-proprietary versions of the identified drawings are provided as Attachment 3 to replace the Bechtel proprietary information contained in the final DCP.

Should you have any questions or require additional information, please contact us.

Very truly yours,



M. L. Bowling, Manager
Nuclear Licensing and Programs

Attachments

1. Virginia Electric and Power Company Design Change Package (DCP) 90-13-1, "Steam Generator Repair" for replacement of the North Anna Unit 1 steam generators. (Contains Bechtel Proprietary Information)
2. Bechtel letter, "Application for Withholding Proprietary Information from Public Disclosure," with affidavit, dated October 12, 1992, identifying the Bechtel proprietary information contained in DCP 90-13-1.
3. Non-proprietary versions of the decontamination specification and non-proprietary versions of the drawings identified in the affidavit.

cc: U.S. Nuclear Regulatory Commission
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Mr. M. S. Lesser
NRC Senior Resident Inspector
North Anna Power Station

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Attachment 2