



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 16, 2020

Mr. Daniel G. Stoddard
Senior Vice President and
Chief Nuclear Officer
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
FOR NORTH ANNA POWER STATION, UNIT 1, PROPOSED INSERVICE
INSPECTION INTERVAL ALTERNATIVE N1-I5-NDE-002
(EPID L-2020-LLR-0075)

Dear Mr. Stoddard:

By letter dated May 18, 2020 (Agencywide Documents Access Management System (ADAMS) Accession No. ML20140A238), Mr. Mark D. Sartain of your staff submitted an affidavit dated June 28, 2018, executed by Glenn A. White, Principal Officer, Dominion Engineering Inc. (DEI), requesting that the information contained in the following document be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

Calculation C-4523-00-02-P, Rev. 0, "North Anna Power Station Unit 1 RPV
[Reactor Pressure vessel] Corrosion Feature Evaluation," (Proprietary)

A nonproprietary version of this document can be found at ADAMS Accession No. ML20140A239.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by DEI.
- (ii) The information is of a type customarily held in confidence by DEI and not customarily disclosed to the public. Any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements that provide for maintenance of the information in confidence.

DEI has a rational basis for determining the types of information customarily held in confidence by it. As described in this Affidavit under paragraph (4) above, the information is held in confidence by DEI because disclosure would substantially affect DEI's competitive business position. This information principally is related to the methodology, assumptions, and detailed analysis procedure of a

proprietary structural analysis of a pressurized water reactor (PWR) reactor pressure vessel.

- (iii) The information sought to be withheld is being submitted to the NRC in confidence by Dominion Energy, and, under the provisions of 10 CFR 2.390, is to be received in confidence by the Commission.
- (iv) To the best of my and DEI's knowledge, no public disclosure of this information has been made, and it is not available in public sources. Information that is available in public sources is not being requested to be withheld, and as such is included in the accompanying non-proprietary version of the report.
- (v) Public disclosure of the information sought to be withheld is likely to cause substantial harm to DEI's competitive position for the reasons listed above in this Affidavit under paragraph (4).

Paragraph (4) of the affidavit states:

- (i) The subject information has substantial commercial value to DEI as significant portions of DEI's future business of providing engineering consulting to nuclear utilities in this area is substantially based upon the information sought to be withheld.
- (ii) Similar products and services are provided by DEI's major competitors. Acquiring of the information sought to be withheld would allow the competitors to take some share of the market for providing engineering consulting services in this area without commensurate expenses.
- (iii) 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.
- (iv) The development of the technology described in part by the information is the result of applying the results of many years of experience and the expenditure of a considerable sum of money.
- (v) There is expected to remain a marketplace for services in the areas related to the subject information and currently provided by DEI (i.e., proprietary finite element analysis or reactor pressure vessel structural integrity) for many years into the future.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the version(s) of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions, please contact me at (301) 415-2481, or via email at ed.miller@nrc.gov.

Sincerely,

G. Edward Miller, Project Manager
Special Projects and Process Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-338

cc: Listserv

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ADAMS Accession No. ML20178A321***Via e-mail**

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DATE	07/15/2020	06/29/2020	07/15/2020	07/16/2020

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