

PROPRIETARY INFORMATION – WITHHOLD UNDER 10 CFR 2.390

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

October 22, 2020

10 CFR 50.90

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

Serial No.: 20-149A
NRA/DEA: 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)
SUPPLEMENT TO THE RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

By letters dated July 12, 2018 and July 31, 2018 [Agencywide Document Access and Management System (ADAMS) Accession Nos. ML18198A118 and ML18218A170, 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 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 the initial review of the LARs and of information provided during the audit and determined that additional information was needed to complete their evaluation. An NRC request for additional information (RAI) was provided in a letter dated February 8, 2019 [ADAMS Accession No. ML19032A055] and Dominion Energy Virginia's response to the RAI was provided in a letter dated July 9, 2019 [ADAMS Accession No.

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

ML19196A109]. 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 was also provided with the response to the RAI.

As part of the continued LAR review, NRC staff conducted a supplemental audit at the Dominion Energy Virginia corporate offices in Glen Allen, Virginia, from January 22-24, 2020. As a result of their review and the interactions at the supplemental audit, the NRC staff established that additional information was needed to complete their evaluation. An NRC RAI was provided in a letter dated April 1, 2020 [ADAMS Accession No. ML20034G217] and Dominion Energy Virginia's response was provided in a letter dated May 28, 2020 [ADAMS Accession No. ML20149K694]. The title of the May 28, 2020 letter was inadvertently the same title as the July 9, 2019 RAI response indicated above.

On August 6, 2020, a teleconference was held between Dominion Energy Virginia and NRC staff to discuss the response to RAI 6 S1 provided on May 28, 2020 and to clarify NRC staff information needs. Attachment 1 to this letter provides supplemental information to the RAI 6 S1 response in support of the NRC's effort to complete their safety evaluation.

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 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 3.

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.

cc: U.S. Nuclear Regulatory Commission, Region II
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Attachment 2

**SUPPLEMENT TO THE RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION REGARDING LARS FOR SBLOCA ANALYSIS METHODOLOGY
(NON-PROPRIETARY)**

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

Supplement to the Response to Request for Additional Information
Regarding LARs for SBLOCA Analysis Methodology
(non-Proprietary)

RAI 6 S1-1

North Anna and Surry Power Station Small Break LOCA (SBLOCA) analyses were both completed using the same analysis method (EMF-2328 and Supplement 1). As typical 3-loop Westinghouse pressurized water reactors, the design of the reactor coolant system (RCS) is very similar at both stations, including similar engineered safety feature and operating parameters. Peak clad temperature (PCT) trends from the analyses performed for North Anna and Surry Power Stations are similar, []. The use of the same method and similarity in the station RCS design created an expectation for similar PCT behavior that is borne out by the observed PCT trends. On this basis, the RCP trip sensitivity performed for North Anna in response to RAI 6 is applicable to Surry. For Surry, the limiting PCT break from the break spectrum analysis is [] not impacted by a delayed RCP trip.

RAI 6 S1-2

Following implementation of the FVI-SBLOCA license amendment at North Anna Power Station the licensing basis PCT will be established as 1801°F, based on the 1-minute RCP trip case. This case will be considered in the assessment of future changes or errors.

Attachment 3

FRAMATOME AFFIDAVIT FOR WITHOLDING PROPRIETARY INFORMATION

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

AFFIDAVIT

1. My name is Gayle Elliott. I am Deputy Director, Licensing & Regulatory Affairs 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 Attachment 1 to a letter to the United States Nuclear Regulatory Commission from Virginia Electric and Power Company, North Anna and Surry Power Stations, Units 1 and 2, Proposed License Amendment Requests, with subject, "Addition of Analytical Methodology to the Core Operating Limits Report for a Small Break Loss of Coolant Accident (SBLOCA) Supplement to the Response to Request for Additional Information," Serial No. 20-149A, Docket Nos. 50-338/339, 50-280/281, and 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 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(d) and 6(e) 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.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 6, 2020



Gayle Elliott