

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

10 CFR 50
10 CFR 51
10 CFR 54

April 2, 2019

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

Serial No.: 19-096
NRA/DEA: R0
Docket Nos.: 50-280/281
License Nos.: DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION (SPS) UNITS 1 AND 2
SUPPLEMENT TO SUBSEQUENT LICENSE RENEWAL APPLICATION
CHANGE NOTICE 2

By letter dated October 15, 2018 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML18291A842), Virginia Electric and Power Company (Dominion Energy Virginia) submitted an application for the subsequent license renewal of Renewed Facility Operating License Nos. DPR-32 and DPR-37 for the Surry Power Station.

The NRC has been conducting an in-office regulatory audit of the SPS Subsequent License Renewal Application (SLRA). The purpose of this letter is to provide additional information and clarifications to address NRC audit needs.

Change Notice 2 consists of the following five Enclosures:

- Enclosure 1: Provides a description of the forty-four topics that require a SLRA supplement and identifies the affected SLRA section and/or table.
- Enclosure 2: Includes mark-ups of affected SLRA sections being supplemented, as described in Enclosure 1. It should be noted that changes to ten commitments (Items #8, #16, #18, #25, #27, #28, #29, #31, #34 and #39) are reflected in Table A4.0-1.
- Enclosure 3: Westinghouse Affidavit for Topical Report WCAP-15550-P, Technical Justification for Eliminating Large Primary Loop Pipe Rupture as the Structural Design Basis for Surry Units 1 and 2 Nuclear Power Plants for the Subsequent License Renewal Program (80 Years) Leak-Before-Break Evaluation, Revision 2 (proprietary)
- Enclosure 4: Westinghouse Topical Report, WCAP-15550-P, Technical Justification for Eliminating Large Primary Loop Pipe Rupture as the Structural Design Basis for Surry Units 1 and 2 Nuclear Power Plants for the Subsequent License Renewal Program (80 Years) Leak-Before-Break Evaluation, Revision 2 (Proprietary)
- Enclosure 5: Westinghouse Topical Report, WCAP-15550-NP, Technical Justification for Eliminating Large Primary Loop Pipe Rupture as the Structural Design Basis for Surry Units 1 and 2 Nuclear Power Plants for the Subsequent License Renewal Program (80 Years) Leak-Before-Break Evaluation, Revision 2 (Non-proprietary)

AD35
NRR

Enclosure 4 contains information that is being withheld from public disclosure under 10 CFR 2.390.
Upon separation from Enclosure 4, this letter is decontrolled.

Since Enclosure 4 contains proprietary information, it is supported by an affidavit signed by the owner of the information (Enclosure 3). 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 is provided in Enclosure 5 as noted above.

If there are any questions regarding this submittal or if additional information is needed, please contact Mr. Paul Aitken at (804) 273-2818.

Sincerely,



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

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 2nd day of April, 2019.

My Commission Expires: 5-31-22



Vicki L. Hull
Notary Public

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.

**VICKI L. HULL
NOTARY PUBLIC
REG. # 140542
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES 5/31/2022**

Enclosures:

Enclosure 1 – Topics That Require a SLRA Supplement

Enclosure 2 – SLRA Mark-ups - Change Notice 2

Enclosure 3 – Affidavit for Withholding Topical Report WCAP-15550-P, Rev. 2

Enclosure 4 – Topical Report WCAP-15550-P, Rev. 2

Enclosure 5 – Topical Report WCAP-15550-NP, Rev. 2

cc: (w/o Enclosures except *)

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
Surry Power Station

Mr. Emmanuel Sayoc *
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop O 11F1
11555 Rockville Pike
Rockville, Maryland 20852-2738

Mr. Tam Tran *
NRC Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop O 11F1
11555 Rockville Pike
Rockville, Maryland 20852-2738

Ms. Karen Cotton
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. James R. Hall
NRC Senior Project Manager
U. S. Nuclear Regulatory Commission
One White Flint North
Mail Stop 08 B1-A
11555 Rockville Pike
Rockville, Maryland 20852-2738

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

Mr. David K. Paylor, Director
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218

Ms. Melanie D. Davenport, Director
Water Permitting Division
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218

Ms. Bettina Rayfield, Manager
Office of Environmental Impact Review
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218

Mr. Michael Dowd, Director
Air Division
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218

Mr. Justin Williams, Director
Division of Land Protection and Revitalization
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218

Mr. James Golden, Regional Director
Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060

Mr. Craig R. Nicol, Regional Director
Virginia Department of Environmental Quality
Tidewater Regional Office
5636 Southern Blvd
Virginia Beach, VA 23462

Ms. Jewel Bronaugh, Commissioner
Virginia Department of Agriculture & Consumer Services
102 Governor Street
Richmond, Virginia 23219

Mr. Jason Bulluck, Director
Virginia Department of Conservation & Recreation
Virginia Natural Heritage Program
600 East Main Street, 24th Floor
Richmond, VA 23219

Mr. Robert W. Duncan, Director
Virginia Department of Game and Inland Fisheries
P.O. Box 90778
Henrico, VA 23228

Mr. Allen Knapp, Director
Virginia Department of Health
Office of Environmental Health Services
109 Governor St, 5th Floor
Richmond, VA 23129

Ms. Julie Lagan, Director
Virginia Department of Historic Resources
State Historic Preservation Office
2801 Kensington Ave
Richmond, VA 23221

Mr. Steven G. Bowman, Commissioner
Virginia Marine Resources Commission
2600 Washington Ave
Newport News, VA 23607

Dr. Mary Fabrizio, Professor
Virginia Institute of Marine Science
School of Marine Science
7509 Roper Rd, Nunnally Hall 135
Gloucester Point, VA 23062

Ms. Angel Deem, Director
Virginia Department of Transportation
Environmental Division
1401 East Broad St
Richmond, VA 23219

Mr. Stephen Moret, President
Virginia Economic Development Partnership
901 East Byrd St
Richmond, VA 23219

Mr. William F. Stephens, Director
Virginia State Corporation Commission
Division of Public Utility Regulation
1300 East Main St, 4th Fl, Tyler Bldg
Richmond, VA 23219

Mr. Jeff Caldwell, Director
Virginia Department of Emergency Management
10501 Trade Rd
Richmond, VA 23236

Mr. Bruce Sterling, Chief Regional Coordinator
Virginia Department of Emergency Management
1070 University Blvd
Portsmouth, VA 23703

Mr. Sanford B. Wanner, Administrator
Surry County
45 School Street
Surry, VA 23883

Utility Customer Instructions

Include the following information in the TRANSMITTAL LETTER to NRC. This is not part of the affidavit.

Enclosed is:

CAW-19-4879, which includes: the Affidavit, Proprietary Information Notice, Copyright Notice

The enclosure 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-19-4879 and should be addressed to Camille T. Zozula, Manager, Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 165, Cranberry Township, Pennsylvania 16066.

Enclosure 3

AFFIDAVIT FOR WITHHOLDING
TOPICAL REPORT WCAP-15550-P, REV. 2

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

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:
COUNTY OF BUTLER:

- (1) I, Korey L. Hosack, have been specifically delegated and authorized to apply for withholding and execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse).
- (2) I am requesting the proprietary portions of WCAP-15550-P, Rev. 2 be withheld from public disclosure under 10 CFR 2.390.
- (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 10 CFR 2.390, 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 and is not customarily disclosed to the public.
 - (ii) 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.

AFFIDAVIT

- (5) Westinghouse has policies in place to identify proprietary information. 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.
- (6) The attached documents are bracketed and marked to indicate the bases for withholding. The justification for withholding 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

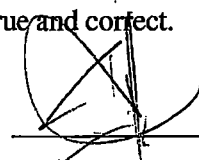
AFFIDAVIT

lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (5)(a) through (f) of this Affidavit.

I declare that the averments of fact set forth in this Affidavit 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: 20190318



A handwritten signature in black ink, appearing to read 'K. Hosack', is written over a horizontal line.

Korey L. Hosack, Manager
Product Line Regulatory Support

PROPRIETARY INFORMATION NOTICE

Transmitted herewith 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 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.