



PROPRIETARY INFORMATION – WITHHOLD UNDER 2.390

October 18, 2016

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

Serial No. 16-380
NRA/WDC R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR
PROPOSED LICENSE AMENDMENT REQUEST REGARDING
REALISTIC LARGE BREAK LOSS OF COOLANT ACCIDENT REANALYSIS
(CAC NO. MF7761)

By letter dated May 25, 2016, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 2 (MPS2). The proposed amendment would add the AREVA topical report EMF-2103(P)(A), "Realistic Large Break Loss of Coolant Accident (RLBLOCA) Methodology for Pressurized Water Reactors," to Technical Specification (TS) 6.9.1.8.b, "Core Operating Limits Report," which lists the analytical methods used to determine the core operating limits. In an email dated September 16, 2016, the Nuclear Regulatory Commission (NRC) transmitted a request for additional information (RAI) to DNC related to the LAR. DNC agreed to respond to the RAI by October 21, 2016.

Attachment 1 to this letter provides DNC's response to RAI Questions 1 through 3, which contain information proprietary to AREVA NP, Inc (AREVA). The non-proprietary version of the responses to RAI Questions 1 through 3 is provided in Attachment 2. Attachment 3 provides DNC's response to the remaining RAI questions, 4 through 6.

Since Attachment 1 contains information proprietary to AREVA, it is respectfully requested that Attachment 1 be withheld from public disclosure in accordance with 10 CFR 2.390. The AREVA application for withholding and affidavit is provided in Attachment 4.

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

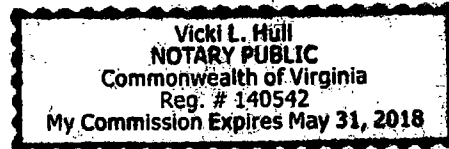
A001
NPP

If you have any questions regarding this request, please contact Wanda Craft at (804) 273-4687.

Sincerely,



Mark D. Sartain
Vice President – Nuclear Engineering

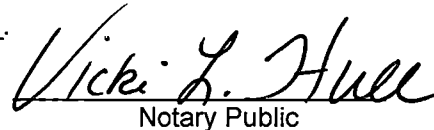


COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain, who is Vice President – Nuclear Engineering of Dominion Nuclear Connecticut, Inc. 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 18TH day of October, 2016.

My Commission Expires: May 31, 2018.


Notary Public

Attachment:

1. Response to Request for Additional Information for License Amendment Request Regarding Realistic Large Break Loss of Coolant Accident Analysis – RAI Questions 1 through 3 (Proprietary)
2. Response to Request for Additional Information for License Amendment Request Regarding Realistic Large Break Loss of Coolant Accident Analysis – RAI Questions 1 through 3 (Non-Proprietary)
3. Response to Request for Additional Information for License Amendment Request Regarding Realistic Large Break Loss of Coolant Accident Analysis – RAI Questions 4 through 6
4. AREVA Application for Withholding and Affidavit

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

R. V. Guzman
Senior Project Manager - Millstone Power Station
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop O8 C2
Rockville, MD 20852-2738

NRC Senior Resident Inspector
Millstone Power Station

Director, Radiation Division
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

PROPRIETARY INFORMATION –WITHHOLD UNDER 10 CFR 2.390

ATTACHMENT 1

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR LICENSE
AMENDMENT REQUEST REGARDING REALISTIC LARGE BREAK LOSS OF
COOLANT ACCIDENT ANALYSIS – RAI QUESTIONS 1 THROUGH 3
(PROPRIETARY)**

**DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 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

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle Elliott. I am Deputy Director, Licensing & Regulatory Affairs, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

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

3. I am familiar with the AREVA information contained in the Licensing Report ANP-3316QP, Revision 0, entitled "Millstone Unit 2 M5[®] Upgrade, Realistic Large Break LOCA Analysis RAI Responses," dated October 2016 and referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA 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 AREVA 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 AREVA to determine whether information should be classified as proprietary:

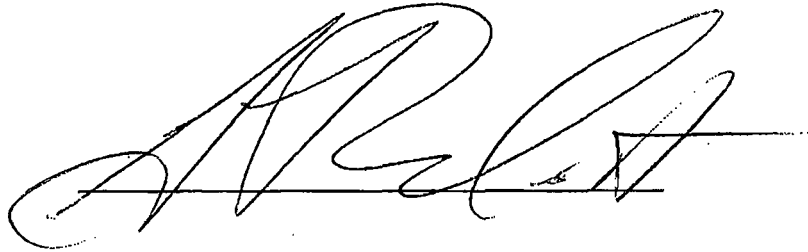
- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (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 AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

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

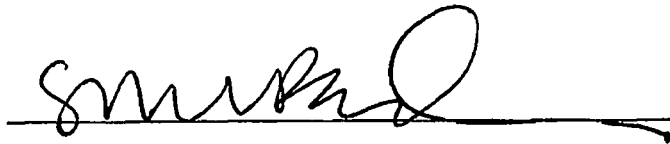
7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use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

8. AREVA 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.

A large, stylized handwritten signature in black ink, written over a horizontal line.

SUBSCRIBED before me this 12th
day of October, 2016.

A handwritten signature in black ink, written over a horizontal line.

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

