



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

February 24, 2017

Scott Greenhaus
Executive Vice President
Structural Group, Inc.
10150 Old Columbia Road
Columbia, MD 21046

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
FOR SURRY POWER STATION, UNITS 1 AND 2 (CAC NOS. MF8987 AND
MF8988)

Dear Mr. Greenhaus:

By letter dated December 14, 2016 (Agency Documents Access and Management System (ADAMS) Accession No. ML 16355A337), Virginia Electric and Power Company (the licensee) submitted an affidavit dated November 23, 2016, executed by you, requesting that the information contained in the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

- Enclosure 1 - Proposed Alternative to ASME Section XI Requirements for Repair/Replacement of Circulating and Service Water Class 3 Buried Piping in Accordance with 10 CFR 50.55a(z)(1)
 - a) Sub-Sections 8a) through 8e)
 - b) Sub-Sections 9 (a) (iii) through 9 (a) (viii)
- Enclosure 4 - Material Manufacturing and Material Qualification, Internal Repair of CW and SW Buried Piping using a CFRP System [withheld in its entirety]
- Enclosure 6 - Sample Installation and QA/QC Procedures - Repair of Plant CW and SW Class 3 Buried Piping using a CFRP System [withheld in its entirety]
- Enclosure 7 - Sample Training Plans for Repair of Plant CW and SW Class 3 Buried Piping using a CFRP System [withheld in its entirety]
- Enclosure 8 - Failure Mode Effects Analysis - Repair of Plant CW and SW Class 3 Buried Piping using a CFRP System [withheld in its entirety]
- Enclosure 9 - Operating Experience [withheld in its entirety]

A nonproprietary copy of Enclosure 1 has been placed in the U.S. Nuclear Regulatory Commission (NRC) Public Document Room and added to the NRC Library (ADAMS Accession No. ML16355A346).

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

The information sought to be withheld from public disclosure is owned by and has been held in confidence by SGI [Structural Group, Inc.].

The information is of a type customarily held in confidence by SGI and not disclosed to the public. SGI has a rational basis for determining the types of information customarily held in confidence by it and utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system provides a rational basis for maintaining confidentiality and justifies the NRC withholding the information from public disclosure.

The information is being transmitted to the NRC in confidence and, under the provisions of 10 CFR 2.390, it is to be received in confidence by the NRC. The information sought to be protected is not available in public sources and, to the best of our knowledge and belief, available information has not been previously employed in the same original manner or method.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of SGI because it would enhance the ability of competitors to provide similar licensing services for commercial power reactors without commensurate expenses.

The development of the technology described in part by the proprietary information is the result of applying the results of many years of experience in an intensive effort by SGI and the expenditure of a considerable sum of money and resources. In order for competitors to duplicate this information, similar technical programs would have to be performed including a significant expenditure money and resources.

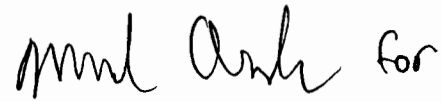
The NRC staff has reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld 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 regarding this matter, I may be reached at 301-415-1438 or e-mail at Karen.Cotton@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Cotton Gross", followed by the word "for" in a cursive script.

Karen Cotton Gross, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

cc: Distribution via Listserv

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE
FOR SURRY POWER STATION, UNITS 1 AND 2 (CAC NOS. MF8987 AND
MF8988) DATED FEBRUARY 24, 2017.

DISTRIBUTION:**PUBLIC**

RidsNrrDorlLpl2-1Resource

RidsNrrPMSurry Resource

RidsOgcMailCenter Resource

RidsAcrcAcnw_MailCTR Resource

DAley, NRR/DE

LPL2-1 R/F

RidsNrrDciCsgb Resource

RidsRgn2MailCenter Resource

RidsNrrLAKGoldstein Resource

JQuichocho, NRR/DE

ADAMS Accession No.: ML17030A081

OFFICE	DORL/LPL2-1/PM	DORL/LPL2-1/LA	NRR/DE/EMCB/BC
NAME	KCotton (MOrenak for)	KGoldstein	JQuichocho
DATE	02/20/17	02/16/17	02/21/17
OFFICE	NRR/DE/EPNB/BC	DORL/LPL2-1/BC	DORL/LPL2-1/PM
NAME	DAley	MMarkley	KCotton (MOrenak for)
DATE	02/23/17	02/24/17	02/24/17

OFFICIAL AGENCY COPY