

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

February 23, 2017

10 CFR 50.55a

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

Serial No.: 17-060
NRA/GDM: R1
Docket Nos.: 50-280/281
License Nos.: DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
SURRY POWER STATION UNITS 1 AND 2
SUPPLEMENT TO PROPOSED ALTERNATIVE TO ASME SECTION XI
REQUIREMENTS FOR REPAIR/REPLACEMENT OF BURIED CIRCULATING AND
SERVICE WATER CLASS 3 PIPING WITH CARBON FIBER REINFORCED
POLYMER

By letter dated December 14, 2016 (Serial No. 16-448), Dominion submitted a proposed inservice inspection (ISI) alternative request in accordance with 10 CFR 50.55a(z)(1) to allow the use of a Carbon Fiber Reinforced Polymer (CFRP) system for the internal repair of buried Circulating Water (CW) and Service Water (SW) systems' piping at Surry Power Station (Surry) Units 1 and 2.

By letter dated February 6, 2017, the NRC provided Dominion an opportunity to supplement the proposed alternative request identified above by providing: 1) specific analyses or technical evaluations demonstrating the structural integrity of the separate CFRP pipe repairs, and 2) the justification and rationale for the use of the Load and Resistance Factor Design methodology for safety related ASME Class 3 piping, and a discussion of the analysis method used in the original design for Class 3 CW and SW piping, and any variances from applying both methods. Dominion's response to the NRC's request for supplemental information is provided in Attachment 1.

The supplemental technical information provided in Attachment 1 for the proposed alternative request was prepared by Simpson Gumpertz & Heger, Inc., and contains information proprietary to that company. Therefore, this information is supported by an affidavit, signed by Simpson Gumpertz & Heger, Inc., the owner of the information. The affidavit sets forth the bases 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 of the Commission's regulations. Accordingly, it is respectfully requested that the information, which is proprietary to Simpson Gumpertz & Heger, Inc., be withheld from public disclosure in accordance with 10 CFR 2.390 of the Commission's regulations. The affidavit is included in the Simpson Gumpertz & Heger, Inc. letter to the NRC entitled, "Withholding of Certain Proprietary Information Pursuant to 10 CFR 2.390," dated February 17, 2017. The Simpson Gumpertz & Heger, Inc. authorization letter is provided in Attachment 2. In conformance with the requirements

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of 10 CFR 2.390 concerning the protection of proprietary information, the proprietary information included in Attachment 1 is considered to be proprietary in its entirety and has been marked in the manner authorized by 10 CFR 2.390(b)(1)(i)(A).

One editorial correction is also noted in Dominion's December 14, 2016 submittal. Specifically, the submittal cover letter stated the date of the Structural Group, Inc., letter to the NRC entitled, "Application for Withholding Proprietary Information from Public Disclosure," which was included in Enclosure 10 of that letter, was dated November 23, 2015. The correct date is November 23, 2016.

If you have any questions or require additional information, please contact Mr. Gary D. Miller at (804) 273-2771.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Sartain", followed by a horizontal line.

Mark Sartain
Vice President - Nuclear Engineering and Fleet Support

Commitments contained in this correspondence: None

Attachments

1. Supplemental Response, Alternative Request to Use Carbon Fiber Reinforced Polymer System for the Internal Repair of Buried Circulating and Service Water Piping [PROPRIETARY]
2. Application for Withholding Proprietary Information from Public Disclosure

cc: U.S. Nuclear Regulatory Commission - Region II
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NRC Senior Resident Inspector
Surry Power Station

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Attachment 2

APPLICATION FOR WITHHOLDING PROPRIETARY INFORMATION
FROM PUBLIC DISCLOSURE

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



17 February 2017

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: Withholding of Certain Proprietary Information Pursuant to 10 CFR 2.390

Reference: (1) Supplemental Response to Letter from Virginia Electric and Power Company to US NRC, "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)," Docket Nos. 50-280 and 50-281, Serial No. 16-448.

Document No.: 161295-SGH-L-002

In Reference (1), Virginia Electric and Power Company (VEP) will provide a submittal to the U.S. Nuclear Regulatory Commission (NRC) that contains certain proprietary information owned by Simpson Gumpertz & Heger Inc. (SGH). SGH provided the information to VEP or a VEP affiliate to support the request made in Reference (1); and VEP is authorized to use this information. As explained in the attached affidavit, SGH's proprietary information contained in Reference (1) qualifies for withholding under the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552(b)(4), the Trade Secrets Act, 18 U.S.C. Section 1905, and NRC regulations 10 CFR 9.17(a)(4) and 2.390(a)(4) for trade secrets and commercial information. SGH respectfully requests that the NRC withhold this information from public disclosure. An affidavit supporting this request is attached.

Please contact me by phone at 781.907.9231 or email at RPOjdrovic@sgh.com if you have any questions concerning this request.

Kind regards,

Rasko P. Ojdrovic
Vice President and Senior Principal
Simpson Gumpertz & Heger Inc.

Attachment: 10 CFR 2.390 Affidavit

10 CFR 2.390 Affidavit

**SIMPSON GUMPERTZ & HEGER INC.
10 CFR 2.390 AFFIDAVIT OF RASKO P. OJDROVIC**

AFFIDAVIT


I, Rasko P. Ojdrovic, hereby state as follows:

- (1) I am the Vice President and Senior Principal of Simpson Gumpertz & Heger Inc. (SGH), and I have been authorized to execute this affidavit on behalf of SGH.
- (2) Virginia Electric and Power Company will submit a transmittal to the US NRC entitled "Supplement to Proposed Alternative to ASME Section XI Requirements for Repair/Replacement of Buried Circulating and Service Water Class 3 Piping with Carbon Fiber Reinforced Polymer" Docket Nos. 50-280 and 50-281, Serial No. 17-060. Certain portions of that transmittal contain proprietary information owned by SGH. This information should be held in confidence by the NRC and withheld from public disclosure. The following is a list of the SGH proprietary information in Virginia Electric and Power Company's transmittal that SGH requests be withheld:
 - Attachment 1, Supplemental Response, Alternative Request to Use Carbon Fiber Reinforced Polymer System for the Internal Repair of Buried Circulating and Service Water Piping
- (3) In making this application for withholding of proprietary information of which it is the owner, SGH believes that the information qualifies for withholding under the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552(b)(4), the Trade Secrets Act, 18 U.S.C. Section 1905, and NRC regulations 10 CFR 9.17(a)(4) and 2.390(a)(4) for trade secrets and commercial information because:
 - i. This information is and has been held in confidence by SGH.
 - ii. This information is of a type that is customarily held in confidence by SGH, and there is a rational basis for doing so because the information includes proprietary information that was developed and compiled by SGH at a significant cost to SGH. This information is classified as proprietary because it contains information relevant to analytical approaches and methodologies not available elsewhere.
 - iii. The information is being transmitted to the NRC voluntarily and in confidence.
 - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
 - v. A substantial effort has been expended by SGH to develop and evaluate this information. Public release of this information could lead to additional significant cost to SGH and is likely to cause substantial harm to SGH's competitive position and foreclose or reduce the availability of profit-making opportunities. The value of this information to SGH would be lost or devalued if the information were disclosed to the public.

- vi. Public disclosure of the information sought to be withheld would provide other parties, including competitors, with valuable information. SGH's competitive advantage would be lost if its competitors are able to use the results of SGH's activities to aid their own commercial activities. For example, SGH's competitive advantage would be lost if its competitors are able to use the results of SGH's analyses to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive SGH of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment.
- vii. The commercial value of the information extends beyond the original development cost, and includes development of the expertise to determine and apply the appropriate evaluation process to the information. The research, development, engineering, and analytical costs that went into generating this information comprise a substantial investment of time and money by SGH. The precise value of this information is difficult to quantify, but clearly is substantial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 17, 2017.



Rasko P. Ojdovic