



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

July 15, 2020

Mr. Daniel G. Stoddard  
Senior Vice President and  
Chief Nuclear Officer  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 29060

SUBJECT: NORTH ANNA POWER STATION UNIT 1 – REQUEST FOR WITHHOLDING  
INFORMATION AND WITHDRAWAL OF PROPOSED INSERVICE  
INSPECTION ALTERNATIVE N1-I5-NDE-003 (EPID L-2020-LLR-0042) AND  
N1-I5-NDE-004 (EPID L-2020-LLR-0039)

Dear Mr. Stoddard:

By letter dated March 19, 2020 (Agencywide Documents Access Management System (ADAMS) Package Accession No. ML20087G300), Mr. Mark D. Sartain of your staff submitted an affidavit dated February 14, 2020, executed by Camille T. Zuzula, Manager, Westinghouse Electric Company LLC, requesting that the information contained in the following document be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

Calculation C-4520-00-02-NP, Rev. 1, "Crack Growth Analysis for NAPS Unit 1 Steam Generator Outlet Nozzles," (Proprietary)

A nonproprietary version of this document can be found at ADAMS Accession No. ML20087G307.

Paragraph (4) of the affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (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

We have 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.

Furthermore, by letters dated March 19, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML20087G307 and ML20087M172), Virginia Electric and Power Company (Dominion Electric) submitted two proposed alternatives to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, reactor vessel head examination frequency requirements for North Anna Power Station Unit 1 (NAPS1). Dominion Electric proposed two changes:

- (1) a one-time extension of the volumetric examination requirements stated in ASME Code Case N-770-2, Table 1, Inspection Item B, from an interval not to exceed seven years to a one-time interval of six nominal 18-month fuel cycles, approximately nine years, N-729-3 and
- (2) to allow the inspection interval defined in ASME Boiler and Pressure Vessel BPV Code Case, N-729-4, "Alternative Examination Requirements for PWR Reactor Vessel Upper Heads with Nozzles Having Pressure-Retaining Partial Penetration Welds," Section XI, Division 1, be extended from the current requirement of 10 to 20 years.

By letter dated June 29, 2020 (ADAMS Accession No. ML20181A588), Dominion requested to withdraw N1-I5-NDE-003 and N1-15-NDE-004 because ASME Code Case N-770-2 and N-729-4 have been revised and the new revisions, N-770-5 and N-729-6, respectively, were recently approved by reference in 10 CFR 50.55a. Code Case N-770-5 extends the inspection frequency for cold leg temperature DM butt welds greater than 14-inches in diameter to once per inspection interval not to exceed 13 years. Code Case N-729-6 allows inspection Item B4.40 to be re-examined once every twenty years. Dominion Electric stated these revisions render the previously submitted alternatives unnecessary and negate the need for Dominion Electric's proposed alternative.

This letter acknowledges the withdrawal of both N1-15-NDE-003 and N1-I5-NDE-004 for North Anna Power Station, Unit 1. No further NRC staff review will be performed under EPIDs L-2020-LLR-042 and L-2020-LLR-0039.

If you have any questions, please contact me at (301) 415-2481 or via email at [ed.miller@nrc.gov](mailto:ed.miller@nrc.gov).

Sincerely,

G. Edward Miller, Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-338

cc: Listserv

SUBJECT: NORTH ANNA POWER STATION UNIT 1 – REQUEST FOR WITHOLDING  
INFORMATION AND WITHDRAWAL OF PROPOSED INSERVICE INSPECTION  
ALTERNATIVE N1-I5-NDE-003 (EPID L-2020-LLR-0042) AND N1-I5-NDE-004  
(EPID L-2020-LLR-0039) DATED JULY 15, 2020

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**ADAMS Accession No. ML20184A168****\*Via Email**

OFFICE	DORL/LPL2-1/PM	DORL/LPL2-1/LA	DNRL/NPHB/BC	DORL/LPL2-1/BC
NAME	EMiller*	KGoldstein*	MMitchell*	MMarkley
DATE	07/15/2020	07/14/2020	07/15/2020	07/15/2020

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