

1101 Market Street, Chattanooga, Tennessee 37402

CNL-21-095

December 21, 2021

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Sequoyah Nuclear Plant, Units 1 and 2
Renewed Facility License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Subject: **Application to Revise Sequoyah Nuclear Plant, Units 1 and 2
Updated Final Safety Analysis Report Regarding Changes to Hydrologic
Analysis – Software Dedication Report 16-01 - Update to Revision 4
(TS-19-02) (EPID L-2020-LLA-0004)**

Reference: TVA Letter to NRC, CNL-21-072, "Partial Response to Additional Request for
Additional Information, (QUESTION 2) Regarding Application to Revise
Sequoyah Nuclear Plant, Units 1 and 2 Updated Final Safety Analysis Report
Regarding Changes to Hydrologic Analysis - Correction of Submitted File Types
Contained on Digital Versatile Disc (TS-19-02) (EPID L-2020-LLA-0004)",
Dated August 13, 2021 (ML21239A115)

In the Reference, Tennessee Valley Authority (TVA) submitted a response to a Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI). The Reference, Enclosure 2, contained two electronic file documents on a Digital Versatile Disc (DVD) to support TVA's RAI response. One of the previously submitted documents was Revision 3 of the Software Dedication Report (SDR) 16-01, generated by Barge Design Solutions, Inc. Upon review of this document by the NRC, it was determined that revisions were needed. Based on discussions between NRC and TVA, TVA hereby submits Revision 4 to the SDR.

Revision 4 of the SDR provides revised content that was made available to the NRC during an audit of the subject application. Please note that this SDR is a generic document applicable to the scope limitations as defined in the NRC approved Topical Report, "TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis Calculation CDQ0000002016000041," Revision 1.

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The previous RAI responses and the technical content of the SDR remain valid. This letter and the enclosed DVD serve to provide an updated version of the SDR.

Enclosure 2 of this letter provides a DVD of digital version of Barge Design Solutions, Inc., Software Dedication Report 16-01, Revision 4 for NRC review. The SDR is considered proprietary. Enclosure 2 contains information that Barge Design Solutions, Inc. (Barge) considers to be proprietary pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public inspections, exemptions, requests for withholding," paragraph (a)(4). Enclosure 1 provides the Barge Design Solutions, Inc. affidavit supporting this proprietary withholding request. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the NRC and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390. Accordingly, TVA requests that the information, which is proprietary to Barge Design Solutions, Inc., be withheld from public disclosure in accordance with 10 CFR Section 2.390. Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Barge Design Solutions, Inc. affidavit should be addressed to Carrie Stokes, Senior Vice President, Barge Design Solutions, Inc., 615 3rd Avenue S., Suite 700, Nashville, TN 37210.

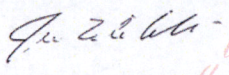
TVA has determined that this letter does not change any results from the no significant hazards considerations or the environmental considerations contained in the original SQN hydrology submittal or previous RAI responses. Additionally, in accordance with 10 CFR 50.91(b)(1), "Notice for Public Comment, State Consultation," TVA is sending a copy of this letter and the enclosures to the Tennessee Department of Environment and Conservation.

There are no new regulatory commitments contained in this submittal.

Please address any questions regarding this submittal to Kimberly Hulvey, Senior Manager, Fleet Licensing at 423-751-3275.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 21st day of December 2021.

Respectfully,

 Digitally signed by Carla Edmondson
Date: 2021.12.21 16:27:26 -05'00'

James T. Polickoski
Director, Nuclear Regulatory Affairs

Enclosures:

cc: See Page 3

~~Proprietary Information -- Withhold from Public Disclosure Under 10 CFR 2.390~~
This letter is decontrolled when separated from Enclosure 2

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Enclosures:

1. Barge Design Solutions, Inc., Affidavit
2. DVD and List of Contents (SDR 16-01, Revision 4 Contains Proprietary Information)

cc: with Enclosures:

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Sequoyah Nuclear Plant, Units 1 and 2
NRC Project Manager - Sequoyah Nuclear Plant
Director, Division of Radiological Health - Tennessee State Department of Environment
and Conservation

Enclosure 1

Barge Design Solutions, Inc., Affidavit

AFFIDAVIT

STATE OF TENNESSEE)

)ss.

COUNTY OF DAVIDSON)

1. My name is Carrie Stokes. I am Senior Vice President, for Barge Design Solutions, Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by Barge Design Solutions, Inc. to determine whether certain Barge Design Solutions, Inc. information is a trade secret, proprietary, and commercially sensitive. I am familiar with the policies established by Barge Design Solutions, Inc. to ensure the proper application of these criteria.

3. I am familiar with the Barge Design Solutions, Inc. information contained in the report:

"Software Dedication Report, PMP Evaluation Tool Package, SDR 16-01" dated November 2021 and referred to herein as "Dedication Report." Information regarding the dedication methodology and test problem suite has been classified by Barge Design Solutions, Inc. as proprietary and a trade secret in accordance with the policies established by Barge Design Solutions, Inc. for the control and protection of proprietary information in furtherance of the business of Barge Design Solutions, Inc..

4. This Dedication Report contains trade secrets and information of a proprietary nature of the type customarily held in confidence by Barge Design Solutions, Inc. 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 Dedication Report as commercially sensitive, trade secrets, proprietary, and confidential.

5. This Dedication Report 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 Barge Design Solutions, Inc. to determine whether information should be classified as proprietary:

- (a) The information reveals details of Barge Design Solutions, Inc.'s research and development processes 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.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Barge Design Solutions, Inc. in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Barge Design Solutions, Inc., would be helpful to competitors, and would likely cause substantial harm to the competitive position of Barge Design Solutions, Inc.

The information in the Dedication Report is considered proprietary for the reasons set forth in paragraphs 6(a) - 6(e) above.

7. In accordance with Barge Design Solutions, Inc.'s policies governing the protection and control of information, trade secrets and confidential or proprietary information contained in this Dedication Report have been made available, on a limited basis, to others outside Barge Design Solutions, Inc. only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Barge Design Solutions, Inc. 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.

FURTHER AFFIANT SAYETH NOT.

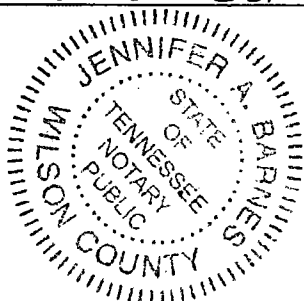
Carey Stiles

SUBSCRIBED before me this 8th day of November 2021

Jennifer A. Barnes
Notary Public

My Commission Expires:

3-8-2025



Enclosure 2

DVD and List of Contents (SDR 16-01, Revision 4 Contains Proprietary Information)

Enclosure 2

DVD List of Contents

PDF Files for ADAMS

1. SDR-16-01 R4 AWA EVAL Tool Combine Files.pdf **Proprietary Information**

Non-PDF Files for Retention in NRC Reading Room

SDR 16-01 R4 Attachments

Proprietary Information

- a. Attachment 2 – AWA Script Modification
 - i. Attachment 2 – AWA Script Modification.xlsx
- b. Attachment 3 – Test Suite Files
 - i. Attachments to Attachment 3
 AWA_Dedication_GIS_Files.zip
 ExcelComparisonFiles.zip
- c. Attachment 9 – Tools
 - i. Attachment to Attachment 9
 Modified_PMP_Evaluation_Tool.zip