

From: <Joseph_Hegner@dom.com>
To: <mls3@nrc.gov>
Date: Fri, Aug 8, 2003 11:14 AM
Subject: Disposition of Comments on Certain North Anna ESP Sections

Mike,

In a recent phone call to Marvin Smith, you noted several sections in the North Anna ESP Table of Contents that weren't included in RS-002 and questioned whether we intended to submit them. One concern you had was lining up appropriate review resources.

The sections were:

- SSAR 2.4.8 Cooling Water Canals & Reservoirs
- SSAR 2.4.10 Flooding Protection Requirements
- SSAR 2.5.6 Embankments & Dams
- SSAR 12.1 ALARA
- SSAR 12.3 Radiation Protection Design Features
- SSAR 12.4 Dose Assessment
- SSAR 12.5 HP Programs

We've reviewed the sections again for applicability. What follows is our assessment of each section and its disposition. In brief, the Chapter 2 sections are retained in our application and the Chapter 12 sections are dropped.

SSAR 2.4.8 Cooling Water Canals & Reservoirs.

SSAR Section 2.4.8 is retained in North Anna ESP application. The section supports SSAR Section 2.4.1, Hydrologic Description, which is in the NRC review standard. In addition, it provides descriptive information regarding existing cooling water canals and features of Lake Anna that are helpful to the reader in understanding cooling water issues for the site. The same NRC resources assigned to Section 2.4.1 will have the knowledge, skills and ability to review this section. In addition, most of the information it provides has previously been reviewed and approved by NRC for Units 1 and 2. Section 2.4.8 length is 3 pages.

SSAR 2.4.10 Flooding Protection Requirements

SSAR Section 2.4.10 is retained in North Anna ESP application. The section supports SSAR Section 2.4.2, Floods, which is in the NRC review standard. It also provides clarification of flooding impacts. The same NRC resources assigned to SSAR Section 2.4.2 will have the knowledge, skills and ability to review this section. Section 2.4.10 length is 1 page.

SSAR 2.5.6 Embankments & Dams

SSAR Section 2.5.6 is retained in North Anna ESP application. The section supports SSAR Section 2.5.5, Stability of Slopes, which is in the NRC review standard. It clarifies the role of the existing North Anna dam, potential future impacts to the existing intake canal embankments, and evaluates the impact of a cut embankment on the slopes of the existing units' service-water reservoir (which is a safety-related structure). The same NRC resources assigned to SSAR Section 2.5.5 will have the knowledge,

skills and ability to review this section. Section 2.5.6 length is 1 page.

SSAR 12.0 Radiation Protection (Not in NRC list; introductory section that describes other Chapter 12 sections)

SSAR 12.1 ALARA

SSAR 12.3 Radiation Protection Design Features

SSAR 12.4 Dose Assessment

SSAR 12.5 HP Programs

NRC RS-002, Attachment 2, Note 6, which is a note appended to a table in the review standard that describes the scope and review criteria for site safety assessment, addresses radiation protection as it relates to an ESP site. The note states that for a proposed site adjacent to an existing licensed facility where the ESP applicant and the other facility licensee are not the same, the licensee for the other facility alone is responsible for ensuring dose to members of the public at the proposed site complies with applicable Part 20 requirements.

This statement is applicable to the North Anna site and the North Anna ESP application. North Anna Units 1 and 2 licensees are Virginia Electric and Power Company and Old Dominion Electric Cooperative. The North Anna ESP applicant will be a Dominion Energy, Inc. subsidiary. Therefore, the existing licensee and prospective applicant at the same site are different and thus radiation protection in accordance with Part 20 at the ESP site is the responsibility of the existing licensed units alone.

The SSAR Chapter 12 sections in the North Anna ESP application make that same distinction and provide the same clarifying information as contained in the NRC review standard. They describe that radiation protection policies and controls would be those of the existing units, describe those programs, and state that workers at the ESP site would be treated as members of the public. Based on the NRC guidance and this assessment, we conclude that SSAR Sections 12.0, 12.1, 12.3, 12.4 and 12.5 need not be included in the North Anna ESP application. Therefore, Sections 12.0, 12.1, 12.3, 12.4 and 12.5 are hereby deleted from the North Anna ESP application.

If you have any questions or need more information, please let me know.

Joe H

CC: <Marvin_Smith%VANCPOWER@dom.com>, <david_batalo@dom.com>

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From: <Joseph_Hegner@dom.com>

Created By: Joseph_Hegner@dom.com

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nrc.gov

owf4_po.OWFN_DO

MLS3 (Michael Scott)

dom.com

david_batalo CC

Marvin_Smith CC

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