



SAFEGUARDS INFORMATION

September 9, 2004

Re: 10 CFR 2.202
10 CFR 50.4

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

Serial No.: 04-242A
NL&OS/MAE: R0
Docket Nos.: 50-245/336/423
50-338/339
50-280/281
72-2/16/47
License Nos.: DPR-21/65
NPF-49
NPF-4/7
DPR-32/37
SNM-2501/2507

DOMINION NUCLEAR CONNECTICUT, INC.
VIRGINIA ELECTRIC AND POWER COMPANY
MILLSTONE POWER STATION UNITS 1, 2, 3 AND PROPOSED ISFSI
NORTH ANNA POWER STATION UNITS 1, 2 AND ISFSI
SURRY POWER STATION UNITS 1, 2 AND ISFSI
SUPPLEMENTAL RESPONSE TO ORDER REQUIRING COMPLIANCE WITH
REVISED DESIGN BASIS THREAT FOR OPERATING POWER REACTORS DATED
APRIL 29, 2003 AND SUBMITTAL OF SECURITY PLAN

On April 29, 2003, the NRC issued Order EA-03-086, Requiring Compliance with Revised Design Basis Threat ("Order EA-03-086" or "Order"). In addition other security related Orders (collectively "Orders") were issued for the Millstone, North Anna and Surry Power Stations. This letter supplements the previous response to Order EA-03-086, which was made by Dominion Nuclear Connecticut, Inc. (DNC) and Virginia Electric and Power Company (Dominion) on May 30, 2003 (Serial Nos. B18910 and 03-331, respectively).

Order EA-03-086 imposes license conditions on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Order required licensees to revise their physical security plans and safeguards contingency plans to provide protection against the revised design basis threat (DBT) set forth in Attachment 2 to the Order. Section III.A also requires licensees to revise the security force training and qualification plan to

NOTE: THE ENCLOSURE/ATTACHMENTS TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF THE ENCLOSURE/ATTACHMENTS, THIS LETTER IS "DECONTROLLED."

SAFEGUARDS INFORMATION

* NS&ROS

implement the revised DBT. DNC/Dominion submitted the revised plans along with an implementation schedule in a Supplemental Response on April 26, 2004 (Serial No. 04-242).

The NRC issued requests for additional information (RAIs) on June 21, 2004, June 25, 2004, July 9, 2004, and July 23, 2004, as well as in numerous telephone conversations. DNC/Dominion responded to these RAIs in letters dated July 1, 2004, July 8, 2004, two letters dated July 19, 2004, August 4, 2004, August 10, 2004, and August 23, 2004 (Serial Nos. 04-395, 04-400, 04-429, 04-400A, 04-400B, 04-463 and 04-504 respectively). In addition, recent responses to telephonic requests for information, along with any other undocketed plan changes are formally documented in Attachment A. The responses to the above RAIs have been incorporated into the Millstone, North Anna and Surry Power Stations' Physical Security Plan, the Contingency Plan, and the Training and Qualification Plan. These revised plans are included as Attachment B.

The revised plans include requirements for the Independent Spent Fuel Storage Installations (ISFSIs) at Surry and North Anna, the proposed ISFSI at Millstone, and Millstone Unit 1, which is being decommissioned. The ISFSIs and Millstone Unit 1 are not addressed by Order EA-03-086. The attached security plans contain the integrated commitments to comply with Order EA-03-086 and other security related Orders issued on February 25, 2002, January 7, 2003, and April 29, 2003. As a result, the enclosed plans supersede previous submittals of DNC/Dominion, including those related to the February 25, 2002, January 7, 2003, and April 29, 2003, Orders. DNC/Dominion will continue to implement the provisions of the previous submittals, except to the extent that they are superseded by these plans. All changes, that have been or will be made, have been or will be evaluated to ensure that they do not compromise plant safety.

With the filing of these plans, DNC/Dominion will be implementing its revised protection strategy and completing plant modifications and security personnel training pursuant to these plans. Upon completion of the implementation of these plans, DNC/Dominion will be in compliance with applicable security requirements. For the purpose of complying with the requirements of 10 CFR Part 73 to conduct an annual audit, the date of the letter that will be submitted to the NRC pursuant to Order EA-03-086 certifying that implementation of the plans is complete will be the effective date for determining commencement of the annual audit requirement period.

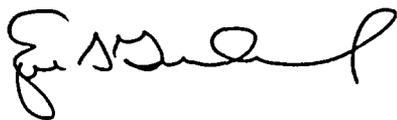
Because of the requirement for these plans to be fully implemented by October 29, 2004; the need to integrate the requirement of the revised DBT Order with the Orders issued February 25, 2002, January 7, 2003, and April 29, 2003; and the Commission's determination that it would be appropriate to exercise enforcement discretion to accommodate any transitional issues which may arise as licensees, in good faith, take reasonable actions to implement the specific requirements of the Orders, DNC/Dominion requests that enforcement discretion continue to be exercised during the transition period until full implementation of the plans is accomplished and the

physical plant modifications and security force training are complete. At that time, the revised plans will be fully implemented and the exercise of enforcement discretion will no longer be necessary.

The enclosed material contains Safeguards Information as defined by 10 CFR 73.21 and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended.

If you have any questions, please contact Ms. Margaret Earle at 804-273-2768.

Very truly yours,



Eugene S. Grecheck
Vice President – Nuclear Support Services
Dominion Nuclear Connecticut, Inc.
Virginia Electric and Power Company

- Attachments: A. Plan Changes Since Our August 23, 2004 RAI Response Letter (SAFEGUARDS INFORMATION)
- B. Millstone, North Anna, and Surry Power Stations' Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program (SAFEGUARDS INFORMATION)

Enclosure: One CD which contains this letter and Attachments A and B (SAFEGUARDS INFORMATION)

Commitments made by this letter: As described in Attachment B.

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COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck who is Vice President-Nuclear Support Services of Dominion Nuclear Connecticut, Inc. and Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 9TH day of September, 2004.

My Commission Expires: May 31, 2006.

Vicki L. Hull
Notary Public

(SEAL)



cc: Director of Nuclear Security (w/o Attachments or Enclosure)
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