



SAFEGUARDS INFORMATION

October 12, 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.: 04-596A
NL&OS/MAE: R1
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
REVISION OF RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION RE: WATERBORNE THREAT
(TAC NOS. MC2938, MC2939, MC2943, MC2944, MC2977, AND MC2978)

The NRC issued an Order dated April 29, 2003, Requiring Compliance with Revised Design Basis Threat ("Order EA-03-086") and other security related Orders (collectively "Orders") for the Millstone, North Anna and Surry Power Stations. Dominion Nuclear Connecticut, Inc. (DNC) and Virginia Electric and Power Company (Dominion) responded to Order EA-03-086 and the other security related Orders (dated February 25, 2002, January 7, 2003 and April 29, 2003) by submission of the Physical Security Plan, the Safeguards Contingency Plan and the Training and Qualification Plan which was transmitted in an April 26, 2004 letter (Serial No. 04-242). The NRC issued requests for additional information (RAIs) related to the Physical Security Plan, Safeguards Contingency Plan and Training and Qualification Plan in letters dated June 21, 2004, June 25, 2004, July 9, 2004, July 23, 2004, and September 10, 2004. DNC and Dominion responded to these RAIs in letters dated July 1, 2004, July 8, 2004, two dated July 19, 2004, August 4, 2004, August 10, 2004, August 23, 2004, September 28, 2004, and two dated October 1, 2004 (Serial Nos. 04-395, 04-400, 04-400A, 04-429, 04-400B, 04-463, 04-504, 04-580, 04-594, and 04-596 respectively). DNC and Dominion resubmitted the Physical Security Plan, Safeguards Contingency Plan and Training and Qualification Plan in a letter dated September 9, 2004 (Serial No.

NOTE: THE ATTACHMENT CONTAINS "SAFEGUARDS INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF THE ATTACHMENT, THIS PAGE IS "DECONTROLLED."

SAFEGUARDS INFORMATION

*NSIR 05

04-242A). A request for a schedule extension to complete implementation of the Order was submitted on September 20, 2004 (Serial No. 04-575).

In an October 6, 2004 telephone conversation, Mr. Michael Burrell of the NRC and Ms. Margaret Earle of Dominion agreed that Dominion would revise the response to an RAI that addressed waterborne threats. That RAI was originally answered on October 1, 2004 (Serial No. 04-596). This revised RAI response supercedes the earlier response regarding waterborne threats, and has no effect on other Physical Security Plan, Training and Qualification Plan and Safeguards Contingency Plan changes discussed in the October 1, 2004 letter. The RAI and associated revised response are attached. A final revision to the Plan will be made after all the RAIs related to the Plan are resolved.

Because of the requirement for these plans to be fully implemented by October 29, 2004; the need to integrate the requirements of the revised Design Basis Threat 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 and Dominion request 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 attached 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,



William R. Matthews
Senior Vice President – Nuclear Operations
Virginia Electric and Power Company
Dominion Nuclear Connecticut, Inc.

Attachment: Clarification of Waterborne RAI (Safeguards Information)

Commitments: A final revision to the Plan will be made after all the RAIs related to the Plan are resolved.

cc: Director of Nuclear Security (w/o Attachment)
Office of Nuclear Security and Incident Response
U. S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

Secretary, Office of the Secretary of the Commission (w/o Attachment)
U. S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, D. C. 20555

Director, Office of Nuclear Reactor Regulation (w/o Attachment)
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Director, Spent Fuel Project Office (w/o Attachment)
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Assistant General Counsel for Materials Litigation and Enforcement
(w/o Attachment)
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

U. S. Nuclear Regulatory Commission (w/o Attachment)
Region I
Regional Administrator
475 Allendale Road
King of Prussia, PA 19406-1415

U.S. Nuclear Regulatory Commission (w/o Attachment)
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303-8931

Ms. M. J. Ross-Lee (w/o Attachment)
U. S. Nuclear Regulatory Commission, Mail Stop O 13 D13
Washington, D. C. 20555

Mr. J. D. Monninger (w/o Attachment)
U. S. Nuclear Regulatory Commission, Mail Stop O 13 D13
Washington, D. C. 20555

Mr. S. R. Monarque (w/o Attachment)
NRC Project Manager North Anna and Surry
U. S. Nuclear Regulatory Commission , Mail Stop 8 H12
Washington, D. C. 20555

Mr. A. B. Wang (w/o Attachment)
NRC Project Manager Millstone Unit 1
U. S. Nuclear Regulatory Commission, Mail Stop 7 E1
Washington, D. C. 20555

Mr. V. Nerses (w/o Attachment)
NRC Senior Project Manager Millstone Units 2 & 3
U. S. Nuclear Regulatory Commission, Mail Stop 8 C2
Washington, D. C. 20555

Mr. R. J. Prince (w/o Attachment)
NRC Inspector
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. M. T. Widmann (w/o Attachment)
NRC Senior Resident Inspector
North Anna Power Station

Mr. N. P. Garrett (w/o Attachment)
NRC Senior Resident Inspector
Surry Power Station

Mr. S. M. Schneider (w/o Attachment)
NRC Senior Resident Inspector
Millstone Power Station