

From: <Vicki_Hull@dom.com>
To: <mls3@nrc.gov>
Date: 10/21/04 10:53AM
Subject: Outgoing NRC Correspondence Serial No. 04-354A: Supplemental Response toRAI
No. 7 - North Anna Early Site Permit Application

(See attached file: 04-354A_Ltr&EncOnly.pdf)

CC: <Joseph_Hegner@dom.com>

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Subject: Outgoing NRC Correspondence Serial No. 04-354A: Supplemental Response toRAI No. 7 - North Anna Early Site Permit Application
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October 20, 2004

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

Serial No. 04-354A
ESP/JDH
Docket No. 52-008

DOMINION NUCLEAR NORTH ANNA, LLC
NORTH ANNA EARLY SITE PERMIT APPLICATION
SUPPLEMENTAL RESPONSE TO RAI NO. 7

In its June 3, 2004 letter titled "Request for Additional Information Letter No. 7," the NRC requested additional information regarding certain aspects of Dominion Nuclear North Anna, LLC's (Dominion) Early Site Permit application. In our August 20, 2004 response (Serial No. 04-354), we provided a partial response to the Request for Additional Information (RAI) and indicated that the remaining three questions would be answered at a later date. This letter contains responses to the remaining three RAIs:

13.3-12, 13.3-13 and 13.3-14

These RAIs involve offsite emergency planning information. Accordingly, the enclosed responses have been prepared by the Commonwealth of Virginia's Department of Emergency Management (VDEM). No update to the North Anna ESP application is required as a result of these responses.

If you have any questions or require additional information, please contact Mr. Joseph D. Hegner at 804-273-2770.

Very truly yours,

A handwritten signature in black ink, appearing to read "Eugene S. Grecheck".

Eugene S. Grecheck
Vice President-Nuclear Support Services

Enclosure: October 14, 2004 letter from VDEM

Commitments made in this letter: None

cc: U. S. Nuclear Regulatory Commission, Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Suite 23T85
Atlanta, Georgia 30303

Mr. Mike Scott
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. M. T. Widmann
NRC Senior Resident Inspector
North Anna Power Station

Mr. Jack Cushing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Art Warren, Manager (w/o enclosure)
Radiological Emergency Preparedness
Commonwealth of Virginia
Department of Emergency Management
10501 Trade Court
Richmond, VA 23236-3713

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 North Anna, LLC. He has affirmed before me that he is duly authorized to execute and file the foregoing document on behalf of Dominion Nuclear North Anna, LLC, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 20TH day of October, 2004.

My Commission expires: May 31, 2006

Vicki L. Hull
Notary Public

(SEAL)

Enclosure

**October 14, 2004 Letter from Commonwealth of Virginia
Department of Emergency Management
Responding to RAIs 13.3-12, 13.3-13 and 13.3-14**



COMMONWEALTH of VIRGINIA

Department of Emergency Management

MICHAEL M. CLINE
State Coordinator

JANET L. CLEMENTS
Deputy Coordinator

L. RALPH JONES, JR.
Deputy Coordinator

10501 Trade Court
Richmond, Virginia 23236-3713
(804) 897-6500
(TDD) 674-2417
FAX (804) 897-6506

October 14, 2004

Mr. William F. Renz
Director, Nuclear Protection Services
and Emergency Preparedness
Dominion Resources Services Incorporated
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, Virginia 23060

Dear Mr. Renz:

In its June 3, 2004 letter to Mr. David A. Christian, Dominion Senior Vice President and Chief Nuclear Officer, subject: Request for Additional Information Letter No. 7, Dominion Nuclear North Anna, 11c Early Site Permit (ESP) Application for the North Anna ESP Site (TAC No. MC1127), the Nuclear Regulatory Commission (NRC) staff requested additional information with respect to the subject application. Three of these requests for additional information (RAIs) concerned matters under the cognizance of the Commonwealth of Virginia and the communities around the North Anna site. These requests were based on Federal Emergency Management Agency reviewer comments.

The attachment contains responses to RAIs 13.3-12, 13.3-13 and 13.3-14. It is understood that Dominion will forward this letter to the NRC and it may be made publicly available.

Sincerely,

A handwritten signature in black ink, appearing to read "Art Warren".

Art Warren
Manager, Radiological Emergency Preparedness

ASW/pf

CC: Michael Cline
Janet Clements
Mary Camp

**Commonwealth of Virginia Department of Emergency Management
 Response to North Anna Early Site Permit Application
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RAI 13.3-12

Please provide capacities of evacuation assembly centers (EACs).

Local EACs in the vicinity of the North Anna site and their capacities are displayed below:

Caroline County		
	Caroline County High School	900
	Caroline County Middle School	500
Hanover County		
	Liberty Middle School	540
	Patrick Henry High School*	1500
Louisa County		
	Trevilians Elementary School	365
	Patrick Henry High School	1500
Orange County		
	Orange County High School	1000
	Prospect Heights Middle School	500
	Gordon Barbour Elementary School	250
Spotsylvania County		
	Courtland High School	3000
	Chancellor High School	4000
	Massaponax High School	3500

*Denotes host school for Louisa.

CROSS REFERENCE TO NUREG-0654 SUPPLEMENT 2

Supplement 2 Evaluation Criteria	Corresponding NUREG- 0654/FEMA-REP-1 Evaluation Criteria	COVRERP section	Local RERP section
A.1	A.1.a	Appendix 2 Appendix 1	Plan §V.B.6.7
A.2.a	A.2.a	Appendix 1	Plan Attachments 11 & 12
A.2.b	A.2.b	Basic Plan Pages 1 & 2	Plan §V.A.1
A.3	A.3	Basic Plan	Plan Attachment 13

**Commonwealth of Virginia Department of Emergency Management
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		Pages 19-21	N/A
B.1	B.6	N/A	N/A
B.2	B.9	N/A	N/A
C.1	C.1.a	Appendix 1 Pages 11-15 Annex A	N/A
C.2	C.3	Appendix 5 Page 3	N/A
C.3	C.4	Appendix 5 Annex A	Plan Attachment 13
C.4	N/A	N/A	N/A
D.1	D.1	N/A	N/A
D.2	D.3	Appendix 4 Annex B	Plan §V.A. 1
E.1	E.1	Appendix 3 Pages 1-6 Annex B Annex A	Appendix 5
E.2	E.2	Appendix 4 Tab A-G	Appendices 1 & 5
E.3	E.6	N/A	Plan §III.G, Appendix 4, Attachments 3 & 7
F.1.a	F.1.b	Annex B	Plan §VII.B.
F.1.b	F.1.c	Annex B	See COVERERP
F.1.c	F.1.e	Appendix 9 Page 3	Appendix 5
F.2	F.2	Appendix 9 Attachment 3	Plan §IX.B
G.1	G.1	Appendix 8 Pages 1 & 2	Plan §V
G.2	G.5	Appendix 12 Page 4	Appendix 2
H.1	H.1	N/A	N/A
H.2	H.2	N/A	N/A
H.3	H.3	Annex A Page 1	
I.1	I.5	N/A	N/A

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I.2	I.7	Appendix 5 Pages 1-6 & Tabs A & B	Appendix 7
I.3	I.11	Appendix 5 Pages 2 & 3 Annex G	N/A
J.1	J.2	Appendix 4 Tab C Attachments 1-4	Not applicable in Orange County.
J.2	J.7	N/A	N/A
J.3	J.8	N/A	N/A
J.4.a	J.10.a	Appendix 4 Attachment 2	Plan
J.4.b	J.10.b	Fig. 5 to Tab F to Attachment 2 to Appendix 4 Fig. 4 to Tab E to Attachment 2 to Appendix 4	Plan, §V
J.4.c	J.10.c	Appendix 4 Page 19 Appendix 8	Plan, §V
J.4.d	J.10.d	Appendix 3 Page 2	Plan, §V
J.4.e	J.10.e	Appendix 6 Appendix 7	Appendix 6
J.4.f	J.10.g	Appendix 4 Attachment 2	Appendix 14
J.4.g	J.10.h	Appendix 4 Attachment 2	Appendix 14
J.4.h	J.10.i	Appendix 4 Attachment 2	Plan Attachment 11
J.4.i	J.10.j	Appendix 10 Annex D	Plan §VII Appendix 4
J.4.j	J.10.k	Appendix 4 Page 8	Plan §VII Appendix 2

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J.4.k	J.10.l	Appendix 4 Tab E to Attachment 2 Fig. 6 to Tab F to Attach. 2 to Appendix 4	Plan Attachment 11
J.4.l	J.10.m	Appendix 4 Amex A	Plan §I.B.7, V.D Attachment 11
J.5	J.12	Appendix 4 Attachment 1 Attachment 4 to Appendix 6	Plan §V.D Appendix 8
K.1.a	K.1.a	N/A	N/A
K.1.b	K.1.b	N/A	N/A
K.1.c	K.1.c	N/A	N/A
K.1.d	N/A	N/A	N/A
K.1.e	K.1.d	N/A	N/A
K.1.f	K.1.e	N/A	N/A
K.1.g	K.1.f	N/A	N/A
K.1.h	K.1.g	N/A	N/A
K.2	K.2	N/A	N/A
K.3.a - K.3.b	K.3.a	Appendix 6 Page 2	Plan §VIII.F Appendix 6
K.4	K.4	Appendix 6 Attachment 7	Appendix 6
K.5.a	K.5.a	Appendix 6 Page 2	Appendix 8
K.5.b	K.5.b	Appendix 10 Pages 4 & 5	Appendix 8
L.1	L.1	Annex G Attachment 1	Appendix 8 §A
L.2	L.3	Annex G Attachment 1 Page 6	N/A
M	N/A	N/A	N/A
N	N/A	N/A	N/A
O.1.a	O.4.a Plan §XII	Appendix 12 Pages 4 & 5	Plan §XII

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O.1.b	O.4.b	Appendix 12 Pages 4 & 5	N/A
O.1.c	O.4.c	Appendix 12 Pages 4 & 5	N/A
O.1.d	O.4.d	Appendix 12 Pages 4 & 5	Plan §XII
Omitted	O.4.e	Appendix 4 Page 4	N/A
O.1.f	O.4.f	Appendix 4 Page 4	Plan §XII
O.1.g	O.4.g	Appendix 4 Page 4	Plan §XII
O.1.h	O.4.h	Appendix 4 Page 4	Plan §XII
O.1.i	O.4.j	Appendix 4 Page 4	Plan §XII
P.1	P.1	Appendix 12 Page 5	Plan §§VII.A & XII.A
P.2	P.2	Basic Plan Page 17	Plan §VII
P.3	P.3	Basic Plan Page 17	Plan §VII
P.4	P.4	Basic Plan Page 17	Plan §VII
P.5	P.5	Basic Plan Page 17	Plan §VII
P.6	P.8	Table of Contents	Plan pages i & iv

RAI 13.3-14

Please provide the following information regarding the State and Local emergency plans:

a) Availability and capabilities of laboratories referred to in the plans.

These capabilities are outlined in the Virginia Department of Health's Radiological Health Program's plan Appendix 17.5 addresses 24 hour availability with the use of a large and small mobile lab in addition to fixed facilities at the Division of Consolidated Laboratory Services.

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b) Description of periodic program in Orange County for informing the public of how they will be notified and what actions should be taken during an emergency.

Annually the Commonwealth of Virginia provides the population within the 10-mile EPZ of North Anna Power Station an Emergency Planning Information Calendar with instructions to follow in case of an emergency at the power station. Information is provided in the calendar regarding sirens and EAS radio and television stations for the area. In addition the Orange County Emergency Coordinator personally distributes these calendars door to door to the approximately one hundred residents within the EPZ.

c) Description of program in Orange County for periodic, non-emergency briefings for the media.

The Orange County public information officer or representative briefs assembled news media, hourly, on the hour, or as the situation dictates either in the Board of Supervisors meeting room or the adjacent hallway Media Briefing Area, utilizing the ingestion pathway map. The public information officer also monitors radio newscasts and scans local newspapers to determine whether information is accurately disseminated to the public; and, takes corrective action as necessary. See Orange County RERP Appendix 2.

d) Explanation for differences between assumptions in the SSAR and assumptions in the State emergency plan regarding reliance on the U.S. Department of Energy for airborne radioactive plume tracking.

Dominion and the Commonwealth of Virginia rely on the Department of Energy for airborne radioactive plume tracking under provisions of the FRERP. Under provisions of the Federal Radiological Emergency Response Plan, DOE may respond to a state or LFA request for assistance by dispatching a Radiological Assistance Program (RAP) team. The DOE Regional Coordinating Office with responsibility for the geographic area where the Dominion ESP site is situated is the Oak Ridge Operations Office in Oak Ridge, Tennessee. The DOE Radiological Assistance Plan, Region 2, includes the states of Arkansas, Louisiana, Mississippi, Missouri, Tennessee, and West Virginia; the Commonwealths of Kentucky, Virginia and Puerto Rico; and the U.S. Virgin Islands. If the situation requires more assistance than a RAP team can provide, DOE will alert or activate additional resources. These resources may include the establishment of a Federal Radiological Monitoring and Assessment Center (FRMAC) to be used as an on-scene coordination center for federal radiological assessment activities. The FRMAC is charged with defining and monitoring the radiological impact of a nuclear or radiological release. Because the effects of radiological contamination may last beyond an immediate emergency, FRMAC serves as a coordination point for radiological monitoring, assessment, evaluation, and reporting activities for the area surrounding a radiological incident, including decontamination, recovery, and long-term environmental monitoring. The FRMAC provides for the coordinated management of federal technical response activities related to a radiological emergency. It has three primary goals:

- Assisting the Commonwealth of Virginia and LFA with personnel, equipment, and technical resources, as needed.*
- Collecting offsite environmental radiological data.*

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- *Providing to the involved Commonwealth of Virginia agencies and local and federal agencies collected offsite environmental radiological data and related assessments.*

A Federal Radiological Monitoring Assessment Center advance party can be expected at the site within 6 to 14 hours following the order to deploy, depending on the availability of airports near the Dominion ESP site. Richmond International Airport (RIC) is a major commercial facility and is within about an 85-minute drive from the Dominion ESP site. Smaller airports located within about an hour of the site may also be used.

e) Clarification of the use of Patrick Henry High School as an EAC and an alternate remote assembly area (RAA).

Patrick Henry High School is the secondary EAC for Hanover County and a primary host school for Louisa County school children. In the event that North Anna is required to send station evacuees to the school, the licensee will request permission in advance, and resources will be provided by Dominion to assist with the monitoring and decontamination of site evacuees.

f) Agreements for assistance (e.g., traffic control) from offsite agencies (such as the Commonwealth of Virginia and Louisa County) in evacuating site personnel.

It is the responsibility of both of these law enforcement agencies to provide traffic control on roads of the Commonwealth. Both VSP and Louisa Co. Sheriff's office routinely train and exercise with company emergency planners. Letters of Agreement with State and County should suffice.

g) Description of measures in Orange County and in the Commonwealth of Virginia RERP (COVRERP) for dealing with potential impediments to use of evacuation routes. COVRERP, Attachment 2 to Appendix 4 paragraph 7 page 4-8, states that "no routes experience any significant congestion during the evacuation of this (NAPS EPZ) area." Appropriate actions are identified for adverse weather conditions.

h) Guidance and/or criteria in local emergency plans for when sheltering should be considered.

A protective action decision is made at the State EOC after local recommendations are considered. A conference call is held to include all jurisdictions in the protective action recommendations. See COVRERP Tab A&B to Attachment 1, Annex A, Conference Call Notification Form and Report of Protective Action Recommendations.

i) Decision-making guidance and authority for emergency workers to exceed U.S. Environmental Protection Agency exposure limits.

VDH/BRH will provide authorization, when needed, for any State Emergency worker to exceed the 15 R TEDE turn back level during an emergency. See RHP Appendix 6, page 20, Paragraph 2.4.

j) Measures (e.g., pocket dosimeter limits) to ensure that the use of an exposure control ratio, as described in the COVRERP, does not result in emergency workers exceeding exposure limits.

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This issue is addressed in detail in the COVRERP and VDH's RHP plan and is in accordance with EPA guidance.

"In order for emergency workers to monitor their own exposure the TEDE dose limit will be decided by an exposure control ration. The exposure control ratio is used to compensate for the radiation dose that is not measurable by a self-reading dosimeter. This ratio is initially set at 3 and is based on default accident source terms. This ration will be adjusted as the accident progresses and will be based on the accident type, once known, and sample analysis performed by the utility." See RHP Emergency Response Plan, Appendix 6, page 20, paragraph 2.3.

k) Description in the COVRERP of the capabilities of local and backup hospital and medical services.

The Medical College of Virginia (MCV) will act as the primary hospital for an individual that is both contaminated and injured. Backup hospital for MCV is: Mary Washington Hospital. Reference COVRERP, Attachment 1 to Annex G, Hospitals.

A. Primary Hospital

*Medical College of Virginia Hospital
1200 East Broad Street
Richmond, Virginia 23219
Telephone: (804) 828-8888*

24-hour emergency department coverage. Will accept 10 critically injured patients at one time. Maximum number of patients will depend on availability of hospital facilities and beds (ED, OR, ICU). MCV has a Radiation Emergency Plan and SOP for medical plans and procedures.

B. Backup for North Anna Power Station Area EPZ

*Mary Washington Hospital/MediCorp Health System
2300 Fall Hill Avenue
Fredericksburg, Virginia 22401
Telephone: (540) 741-1111*

24-hour emergency department coverage. Can accept an unlimited number of patients; will make final determination at time of arrival.

l) Description in the COVRERP of the program for qualifying State and local directors/coordinators of emergency response.

Reference COVRERP, Appendix 12, Training and Exercises.

VDEM provides an on-going training program for instructing State and local personnel to perform emergency response functions. All State and local emergency response personnel are offered training through the Radiological Emergency Response Program annually. This program includes basic response information as well as job specific training. A detailed database is maintained by the Radiological Emergency Response Program consisting of courses completed by individuals within the last 5 years.

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m) Description of the training program for the Orange County Emergency Services Coordinator.

The Virginia Department of Emergency Management provides initial training and retraining for the emergency services coordinator and other emergency services related personnel, i.e. EOC support staff.

n) Description in the Orange County RERP of criteria or plans for periodic review and update of the plan or agreements.

A Record of Change is maintained in the Orange County RERP. Training and exercises are conducted to assure the adequacy and update of the plan on a biennial basis.

o) Cross-references in the Orange County RERP to the criteria in Supplement 2 to NUREG-0654/FEMA-REP-1.

See previous cross-reference chart.