



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 12, 2004

Dr. Ted B. Doerr
Los Alamos National Laboratory (LANL)
MS M887
ESH-20 ECOLOGY
Los Alamos, NM 87545

SUBJECT: PLACEMENT OF TASK ORDER NO. 15, "REVIEW OF ENVIRONMENTAL REPORT SUBMITTED IN SUPPORT OF THE DOMINION GENERATION LICENSE RENEWAL APPLICATION FOR MILLSTONE, UNITS 2 AND 3," UNDER JCN J-2904, "TECHNICAL ASSISTANCE FOR ENVIRONMENTAL REVIEW OF LICENSE RENEWAL APPLICATIONS"

Dear Dr. Doerr:

This letter transmits the statement of work for Task Order No. 15, which has been discussed and agreed upon between you and Barry Zalzman, of my staff, and which is in accordance with the LANL contract proposal dated September 8, 2003, and task proposal dated February 19, 2004. LANL is authorized to proceed in performing the work specified in the enclosed statement of work. The cost ceiling established for this task is \$469,300. Incremental funding of \$150,000 is hereby allocated for Task 15 from funds provided under separate correspondence dated January 8, 2004. These funds will not be redirected to other task orders within this JCN without prior written authorization from the NRC. As Task Leader you are considered a key personnel for this task as are each of the principal investigators.

In accordance with the procedures established in the project statement of work (NRC Form 189), please confirm your acceptance of this task order by e-mail to Ms. Sally A. Adams (saa2@nrc.gov) and by signing below and returning this letter to Ms. Adams (Mail Stop O-12 E-5) through the U.S. mail. Please call Ms. Adams if you have any comments or questions concerning the acceptance of this task order; she can be reached at (301) 415-0209. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "P. T. Kuo".

P. T. Kuo, Program Director
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Enclosure:
Statement of Work

Accepted:

Ted Doerr
Project Manager, JCN J-2904

Date

B/1

**STATEMENT OF WORK FOR
TASK ORDER NO. 15 UNDER JCN J-2904**

TITLE: Review of Environmental Report Submitted in Support of the Dominion Generation License Renewal Application for Millstone, Units 2 and 3

NRC Project Manager: Sally A. Adams (301) 415-0209

NRC Technical Monitor: Richard L. Emch, Jr. (301) 415-1590

TAC Numbers: MC1827 and MC1828

NRR Priority Number: 1

BACKGROUND

On December 18, 1996, the NRC promulgated new rules for the environmental review associated with the renewal of nuclear power plant operating licenses (61 FR 66537). The rule was based on a systematic evaluation of environmental impacts associated with the renewal of a nuclear power plant license. The evaluation was documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants" (GEIS), and its Addendum 1. The NRC has updated its regulatory guidance to address radiological and non-radiological environmental issues for plants seeking license renewal. The Environmental Standard Review Plan for Environmental Reviews for Nuclear Power Plants," (ESRP) NUREG-1555, contains generic guidance for the Office of Nuclear Reactor Regulation (NRR) staff review of an application for renewed operating license for nuclear power plants.

On January 23, 2004, Dominion Generation (Dominion) applied for a renewed license under 10 CFR Part 54 for Millstone, Units 2 and 3. As part of the application, an environmental report was submitted as required by 10 CFR Part 51.

OBJECTIVE

The objective of this task order is to assist the NRC in its review of environmental protection requirements associated with the Dominion license renewal application. In addition to the NRC Project Manager, the NRC has designated an Environmental Project Manager (EPM), Mr. Richard L. Emch, Jr. The EPM for this task is also the Task Order Technical Monitor.

TECHNICAL AND OTHER SPECIAL QUALIFICATIONS, AND KEY PERSONNEL

The use of experienced personnel for the key positions on this task is considered essential to the success of the overall project. At a minimum, key personnel will include the LANL Project Manager, Project Team Leader (PTL), Task Leader (who may also serve in the capacity of the

PTL), and each principal investigator overseeing or performing the actual work. Key personnel cannot be changed without the approval of the Technical Monitor, which will be communicated to the contractor by the NRC Project Manager. Technical personnel shall have demonstrated expertise in the area of their responsibility on this project.

The PTL and Task Leader will have in-depth expertise in at least one of the issues covered by the ESRP, familiarity with the GEIS, familiarity with the ESRP and its intended use by the NRC, and a general understanding of the range of issues covered by the ESRP. The PTL and Task Leader will have extensive experience in the technical and regulatory aspects of evaluation the environmental impacts of the construction and/or operation of major industrial facilities that require reviews under the National Environmental Policy Act (NEPA), as, for example, nuclear power plants, and should have expertise in methods used to mitigate the impact on the environment.

It is the responsibility of the contractor to assign principal investigators, technical staff, employees, consultants, subcontractors, or specialists who have the required educational background, experience, or combination thereof to meet both technical and regulatory objectives of the work specified in this SOW.

Although the NRC implemented a strategy that involves a multi-discipline, multi-laboratory team as outlined in the underlying contract Statement of Work, during the conduct of this task, no participating laboratory personnel (other than LANL) will be involved in team activities for this license renewal project. The PTL and LANL Task Leader, and the NRC Technical Monitor will coordinate the schedule and level of participation of LANL personnel in project activities. In addition to the technical review, all other activities, including document management, are covered under this task order. Communications issues among the PTL and all principal investigators were outlined in the underlying contract Statement of Work.

The NRC will rely on representation made by the contractor concerning the qualifications of the LANL personnel assigned to this project including assurance that all information contained in the technical and cost proposals, including resumes, is accurate and truthful. Principal investigators may be called upon to present technical information at public meetings, and to provide written and oral testimony at adjudicatory hearings that may be held on this licensing action. Whether or not a hearing is to be conducted and, if so, its scope has not been determined. Consequently, participation at hearings will be covered under another task; however, the principal investigators designated for this work effort will be expected to participate in the hearing process, if necessary.

The results of this effort have the potential to impact entities regulated by the NRC and industry organizations. The contractor must be absolutely free from direct or the appearance of organizational conflict of interest with respect to any of these entities. If any work will be subcontracted or performed by consultants, the contractor shall obtain the NRC's written approval of the subcontractor or consultant prior to initiation of the subcontract effort. Conflict of interest considerations will also apply to any subcontracted effort.

WORK REQUIREMENTS AND SCHEDULE

Upon the acceptance of this task order, LANL will propose and designate the PTL and LANL Task Leader who will direct the task efforts for delivering consistent, high-quality products and services that satisfy client requirements meeting scheduler and budget commitments. A Project Plan will be developed to integrate task management, task oversight, commitment tracking, quality and records control, cost and schedule control, selection of technical and support staff, project meetings, LANL staff orientation, interactions with other NRC contractors involved in guidance development activities, and travel. For planning purposes, it is expected that the PTL and all LANL principal investigators will participate at the site visit. A subset of the principal investigators, as determined by the Technical Monitor, will be available for observation of the public meetings on scoping. All LANL principal investigators will plan to participate in the preparation of the NRC site-specific Draft Supplement to the GEIS. Other interactions with the applicant (e.g., public meetings to clarify technical issues) may involve only limited participation by LANL staff. LANL will assess the need for any necessary hardware and software to meet the technical requirements of this project consistent with NRC and Federal acquisition regulations. Any acquisition will follow the process outlined in the project scope of work.

The LANL Task Leader will develop a Project Plan for the efforts covered by this work scope. The Task Leader will document deliverables with milestones and schedules in the project monthly letter status reports (MLSR) and the commitment tracking logs. All work will be documented on the indicated forms referenced in the Project Plan. Unless otherwise specified by the NRC Project Manager, all deliverables will be produced in both electronic (Corel WordPerfect 8 or other agreed upon software required for use in analytical codes) and hard copy version. The WordPerfect files must not contain unintentional codes introduced by file conversion of inputs originated in other than WordPerfect format.

Unless otherwise requested by the NRC Project Manager, the contractor will deliver one hard copy of all deliverables (draft and final) to the NRC Project Manager and one copy to the NRC Technical Monitor. The electronic versions of the deliverables will be delivered to the Technical Monitor with notification of the delivery to the NRC Project Manager. The contractor will identify the Job Control Number (JCN-2904), the Task Order assignment number (15), and the Technical Assignment Control Numbers on all correspondence related to this task.

Working meetings should be anticipated to be held at LANL in advance of preparing deliverables, which will serve as input to NRC documents that will be released into the public domain. At a minimum, the Technical Monitor will participate in each of these meetings and the NRC legal staff, NRC technical team members, NRC management, and the NRC Project Manager will participate on a less frequent basis. Work plans should accommodate the following expected deliverables; interim milestones may be established for draft material [e.g., drafts of Technical Evaluation Reports (TER)]:

TASK DESCRIPTION

DUE DATE OR DAYS

(A) Conduct initial review of the ER and provide recommendation for acceptance review conclusion

within 15 days of authorization or receipt of the Environmental Report from the application

<u>TASK DESCRIPTION (Cont'd)</u>	<u>DUE DATE OR DAYS</u>
(B) Develop Project Plan	15 work days after authorization
(C) Provide planning and support for (1) NRC/LANL-led team site visit, (2) for concomitant public scoping meeting near the site, and (3) participation in meeting	no later than week of 05/17/04
(D) Assist EPM in assembling, sorting, and dispositioning comments from the scoping meeting	no later than week of 06/21/04 - activities occur concurrent with (E)
(E) Perform detailed review of ER and submit TER that identifies issues and areas that should be clarified; the TER should be organized following the structure of the ER and should be phrased in question format	no later than week of 06/21/04
(F) Subsequent to NRC issuance of Requests for Additional Information (RAIs); at a minimum, the Task Leader will support NRC at a public meeting to discuss the RAIs with the applicant, if needed	no later than week of 07/26/04
(G) Complete technical review of the ER and responses to RAIs, and provide TER to serve as input for Draft Supplement to the GEIS (SEIS) in camera ready form	no later than week of 10/18/04
(H) Plan and provide support for the public meeting near the site to discuss draft SEIS and participate in meeting	no later than week of 01/17/05
(I) Support EPM in assembling, sorting, and dispositioning comments received at the public meeting and during the public comment period	no later than week of 04/25/05
(J) Complete review and provide TER to serve as input for Final SEIS in camera ready form	no later than week of 05/30/05
(K) Support EPM in addressing comments on Final SEIS	through week of 08/22/05

LEVEL OF EFFORT

The level of effort for this task is estimated at 60 staff (professional and support) weeks.

PERIOD OF PERFORMANCE

The period of performance is projected to be through August 2005.

MEETINGS AND TRAVEL

The following travel assumptions should be considered in planning the work effort. It is likely that a smaller group than the entire review team will be necessary to accomplish the activity; the actual travel contingent will be determined by the Technical Monitor after discussion with the PTL and LANL Task Leader. Travel in excess of the number of person-trips must be approved by the NRC Project Manager; travel within the work scope limits will be approved by the Technical Monitor. One, four-day site visit should be planned by the Task Leader for site familiarization and to establish needs for site audit. One, five-day site visit should be planned for the entire review team for (1) site familiarization, (2) information gathering meetings with the applicant and State and local governmental and other organizations, and (3) the public scoping meeting near the site. Should special provisions be necessary to assure that selected LANL staff may fully participate in site familiarization activities (including overflights and/or shoreline visits), the LANL requirements shall be identified to the Technical Monitor 30 days in advance; for planning purposes, NRC may rely upon LANL to make arrangements for appropriate air- and watercraft to conduct site familiarization activities. One, four-day trip should be planned for the PTL, and key LANL principal investigators to be identified by the Technical Monitor, to attend a meeting near the site to provide insight to members of the public to assist them in providing comments on the Draft SEIS. Two, one-person three-day trips to NRC Headquarters should be planned for the PTL to participate in public meetings with the applicant and internal NRC meetings with NRC project staff. LANL will plan on making key personnel assigned to the task available for any project progress meeting or program review that may be held at LANL while the task is active. Working meetings with NRC staff should be planned during the four week period prior to the completion of the Draft and Final SEIS. Progress meetings should be planned to occur quarterly.

OTHER APPLICABLE INFORMATION

The work specified in this task is license fee recoverable under 10 CFR Part 170.

NRC SUPPLIED INFORMATION

The Technical Monitor will provide copies of the applicant's license renewal Environmental Report and any pertinent NRC environmental documents and docketed correspondence on environmental issues.