

Bruce Musico

From: Dan Barss
Sent: Monday, August 25, 2008 9:46 AM
To: Bruce Musico
Cc: Kevin Williams
Subject: FW: Letter From Vanessa E. Quinn Re: IFR North Anna
Attachments: 08-22-08 Letter Brock IFR North Anna.doc; 08-22-08 Attachment Letter Brock IFR North Anna.doc

Bruce,

For your action. FEMA's interim findings report for North Anna.

Dan

From: Kathryn Brock
Sent: Sunday, August 24, 2008 6:12 AM
To: Dan Barss
Subject: FW: Letter From Vanessa E. Quinn Re: IFR North Anna

From: Dowgwillo, Theresa [mailto:Theresa.Dowgwillo@dhs.gov]
Sent: Friday, August 22, 2008 4:43 PM
To: Kathryn Brock
Cc: Quinn, Vanessa
Subject: Letter From Vanessa E. Quinn Re: IFR North Anna

Dear Ms. Brock:

Please find attached a letter to your attention from Vanessa E. Quinn, Chief, Radiological Emergency Preparedness Branch, FEMA. The original has been sent to you via normal USPS mail deliver.

Thank you,

T. René Dowgwillo

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Radiological Emergency Preparedness Branch
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FEMA

August 22, 2008

Ms. Kathryn Brock
Acting Chief
Regulatory Improvements and Outreach Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Ref: Interim Findings Report for the North Anna Power Station Combined License (COL)
Application

Dear Ms. Brock,

Please find enclosed the Interim Finding Report for the North Anna Power Station Combined License (COL) Application submitted by the Radiological Emergency Preparedness (REP) Program staff from our Region III Office. The information pertaining to offsite radiological emergency response plans provided in the COL application was utilized in establishing the content of this report.

After careful review of the offsite plans by FEMA Region III, it has been determined that 48 Adequate Criteria, 60 Adequate-Corrections Required Criteria, and 1 Inadequate Criterion were identified. Thus the overall determination is Adequate-Corrections Required for the North Anna Offsite Radiological Emergency Response Plan. Additionally, based on FEMA's findings, the current plans are sufficient to protect the health and safety of the public, and there is reasonable assurance that the appropriate protective measures can, and will be applied offsite in the event of a radiological emergency.

Should you or members of your staff have any questions regarding this matter, please contact Ms. Bonnie Sheffield at (202) 212-2120 or Mr. Thomas Strother at (202) 212-2121.

Sincerely,

A handwritten signature in black ink, appearing to read "Vanessa E. Quinn".

Vanessa E. Quinn

Chief

Radiological Emergency Preparedness Branch

Enclosure: As stated

INTERIM FINDINGS REPORT

**On the Adequacy of Offsite
Radiological Emergency Response Planning and Preparedness
For the
Proposed North Anna Power Station Unit 3**

August 22, 2008

Prepared by the
Federal Emergency Management Agency
Preparedness, Training, and Exercises Directorate
Exercises Division

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I. EXECUTIVE SUMMARY

On November 27, 2007, Dominion Virginia Power (Dominion) submitted a Combined License Application (COL) to the U.S. Nuclear Regulatory Commission to construct and operate Unit 3 of the North Anna Power Station (NAPS) facility located in Louisa County, Virginia, approximately 40 miles north-northwest of Richmond. Part 5 of the COL application contained the proposed North Anna Power Station Unit 3 Combined License Application Emergency Plan.

The two existing reactors at NAPS have been on-line since 1978 and 1980. FEMA granted formal approval of the initial offsite response jurisdiction's (ORO's) Radiological Emergency Response Plans (RERPs) in February 1983 under 44CFR350.8. A qualifying exercise, under the requirements of 44CFR350.9, was conducted on September 18, 1983. On September 2, 1987, FEMA completed its review of the alert and notification system installed around NAPS and determined that the system is adequate to provide prompt alerting and notification to the public in the event of an emergency at the site. This review is of the current ORO's plans.

The COL application's supplemental information included the existing RERPs from the Commonwealth of Virginia (dated May 2007), Louisa County, Caroline County, Hanover County, Orange County, and Spotsylvania County (all dated October 2006). It also included the Evacuation Time Estimate (ETE) report prepared by KLD Associates, Inc., dated October 2007. The Emergency Response Plan (ERP), and a separate NUREG-0654 Cross Reference, for the Virginia Department of Health/Division of Radiological Health (VDH/DRH) was also provided; however, the Standing Operating Procedures (Appendix 17) of the plan were not provided for review. Although the 50-mile Ingestion Planning Zone extends into the State of Maryland, the Maryland RERP was not provided for review.

The materials listed above were the basis for the review. NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," amended March 2002, and its Supplements, the Interim REP Program Manual, dated August 2002, current FEMA guidance documents, and established industry practices were considered in making the determination as to the plans' adequacy.

The review of the offsite emergency plans resulted in evaluation findings for all of the planning standards and associated criteria contained in NUREG-0654/FEMA-REP-1, Rev. 1, as amended, that are ORO responsibilities. Each planning standard and criterion was rated as:

- Adequate: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
- Adequate – corrections must be made: Plans are adequate but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g. adequacy and maintenance of procedure, training, resource, staffing levels and qualifications, and equipment).
- Inadequate: Plans are inadequate and cannot be implemented until they are revised to corrected deficiencies noted in the Federal review.
- N/A: The planning standard or criterion is not applicable to this ORO.

The initial review resulted in the following interim evaluation findings (ratings by criterion are summarized in Table 1, Rating Summary):

- Planning Standard A: Adequate – corrections must be made.
- Planning Standard B: N/A
- Planning Standard C: Adequate – corrections must be made.
- Planning Standard D: Adequate.
- Planning Standard E: Adequate – corrections must be made.
- Planning Standard F: Adequate – corrections must be made.
- Planning Standard G: Adequate – corrections must be made.
- Planning Standard H: Adequate – corrections must be made.
- Planning Standard I: Adequate – corrections must be made.
- Planning Standard J: Adequate – corrections must be made.
- Planning Standard K: Adequate – corrections must be made.
- Planning Standard L: Adequate – corrections must be made.
- Planning Standard M: Adequate – corrections must be made.
- Planning Standard N: Adequate – corrections must be made.
- Planning Standard O: Adequate – corrections must be made.
- Planning Standard P: Adequate – corrections must be made.

Adequacy of the NAPS COL Application Emergency Plan review for OROs is also dependent on:

- Satisfactory resolution of the above evaluation results that are “adequate – corrections must be made.”
- An adequate demonstration of the completion of the COL Application Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria as it relates to OROs.
- Satisfactory demonstration of plan implementation during a joint exercise with the licensee and state and local governments, as described in 44CFR350.9, and utilizing NAPS Unit 3 facilities.

II. INTRODUCTION

A. General Characteristics of the North Anna Power Station

The North Anna Power Station (NAPS), consisting of approximately 1,856 acres, is located in Louisa County on the southern shore of Lake Anna in central Virginia, 40 miles northwest of Richmond, 38 miles east of Charlottesville, and 24 miles southwest of Fredericksburg.

The 10-mile plume Emergency Planning Zone (EPZ) includes Louisa, Carolina, Hanover, Orange and Spotsylvania Counties. While the 50-mile ingestion pathway zone (IPZ) includes all or parts of Louisa, Hanover, Orange, Spotsylvania, Albemarle, Amelia, Buckingham, Chesterfield, Culpeper, Cumberland, Essex, Fauquier, Fluvanna, Goochland, Greene, Henrico, King George, King and Queen, King William, Madison, New Kent, Page, Powhatan, Prince William, Rappahannock, Richmond, Stafford and Westmoreland Counties in the Commonwealth of Virginia and Charles County in the State of Maryland.

NAPS is owned and operated by Dominion Generation.

B. Emergency Response Organization

In the Commonwealth of Virginia, the implementation of protective actions beyond the site boundary but within the 10-mile plume exposure EPZ and within the 50-mile IPZ is the primary responsibility of the elected officials of the local governments. As time may be a critical factor in providing protection against plume exposure, initial response is based on the implementation of preplanned actions. Follow-up action will be taken on the advice of the Virginia Emergency Operations Center (EOC) personnel based on the results of evaluation and assessment of the accident. Local directors of emergency services may take independent and preemptive action to implement protective actions within their jurisdictions. Jurisdictions implementing preemptive local protective actions will ensure that the Virginia EOC and surrounding jurisdictions are fully informed of all actions and decisions.

The Virginia Department of Emergency Management (VDEM) will activate and coordinate implementation of the State plan, to include assistance to local governments and coordination of emergency response actions of Federal and State agencies.

The Virginia Department of Health (VDH) will implement procedures to determine actual off-site radiation distribution to refine the projected dose. Based on this assessment, VDH will recommend protective actions to be taken. VDH will evaluate the radiological situation on a continuing basis from the time of initial notification until the radiological emergency is over. It will provide technical guidance and assistance relative to actions required, as indicated by the situation.

Radiation assessment and coordination of protective actions within the IPZ will be the primary responsibility of the VDEM and VDH in cooperation with the Virginia Department of Agriculture and Consumer Services and the Virginia Department of Environmental Quality, Water Division.

In the State of Maryland, the implementation of protective actions within the 50-mile IPZ is the primary responsibility of the Secretary of the Department of the Environment with assistance provided by other state agencies and the local governments.

C. Plans

The Commonwealth of Virginia Radiological Emergency Response Plan (COVRERP) is Volume III of the *Commonwealth of Virginia Emergency Operations Plan Peacetime Disasters*. Volume III includes the basic plan as well as the organization concepts and policies and establishes the assignments of emergency responsibilities for radiological emergencies. The Appendices and Annexes in Volume III also include operational concepts and procedures for specific emergency responsibilities for State departments.

Louisa, Caroline, Hanover, Orange, and Spotsylvania Counties maintain separate Radiological Emergency Response Plans (RERPs). The individual plans contain the county's concept of operations and policies. Appendices assign specific emergency responsibilities to local government agencies.

The *North Anna Power Station Development of Evacuation Time Estimates*, October 2007 (report prepared by KLD Associates, Inc.), was also used in the review of the plans.

One county in the State of Maryland, Charles County, is in the 50-mile ingestion planning zone for NAPS. The State of Maryland plan was not provided for review.

D. Basis for Findings

The status of emergency preparedness for offsite response to possible incidents resulting from an accident at the NAPS has been determined based on:

- Review of the *Commonwealth of Virginia Radiological Emergency Response Plan (COVRERP)*, Volume III, *The Commonwealth of Virginia Emergency Operations Plan Peacetime Disasters*, May 2007.
- Review of the *Commonwealth of Virginia Department of Health/Division of Radiological Health and Safety Regulations, Emergency Response Plan*, 2007 (without Appendix 17 Standard Operating Procedures).
- Review of the *Louisa County Radiological Emergency Response Plan (RERP)*, October 2006.
- Review of the *Caroline County Radiological Emergency Response Plan (RERP)*, October 2006.
- Review of the *Hanover County Radiological Emergency Response Plan (RERP)*, October 2006.

- Review of the *Orange County Radiological Emergency Response Plan (RERP)*, October 2006.
- Review of the *Spotsylvania County Radiological Emergency Response Plan (RERP)*, October 2006.

E. Evaluation Format

In accordance with the FEMA/NRC Memorandum of Understanding dated June 17, 1993, FEMA has agreed to furnish assessments, findings, and determinations as to whether State and local emergency plans and preparedness are adequate and capable of implementation.

Guidance for review and development of radiological emergency response plans is contained in the document NUREG 0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," amended March 2002. NUREG-0654/FEMA-REP-1 and its Supplements, the Interim REP Program Manual, dated August 2002, current FEMA guidance documents, and established industry practices are considered in making the determination as to a plan's adequacy.

III. REVIEW AND EVALUATION OF EMERGENCY PREPAREDNESS PLANS AND PROCEDURES FOR THE NORTH ANNA POWER STATION UNIT 3 COL AGAINST THE PLANNING STANDARDS OF NUREG-0654/FEMA-REP-1, REV. 1

The following table and discussion present the results of the review and evaluation for each criterion. A total of 109 criteria were evaluated. Forty-eight criteria were found to be adequate, and one criterion was found to be inadequate. Sixty criteria were designated as adequate – corrections must be made.

Rating Categories:

Adequate – The statements and concepts in the Plan adequately meet the intent of the planning criterion. Recommendations for consideration may be provided.

Adequate - Corrections Must Be Made (Adequate/Corr.) – Plans are **adequate**: but before a determination can be made as to whether they can be implemented, **corrections must be made** to the plans or supporting measures must be demonstrated (e.g. adequacy and maintenance of procedure, training, resource, staffing levels and qualifications, and equipment).

Inadequate – The statements and concepts in the Plan do not adequately address the planning criterion.

N/A - Not Applicable – The planning criterion is not applicable to the organization/documents under review and is not required to be addressed in these documents. The planning criterion has to be addressed elsewhere in the Plan.

**Table 1: Rating Summary
for Virginia and Risk County REP Plans in Support of North Anna COL**

Element	Rating	Element	Rating	Element	Rating
A.1.a	Adequate	H.3	Adequate	M.1	Adequate/Corr
A.1.b	Adequate	H.4	Adequate/Corr	M.3	Adequate/Corr
A.1.c	Adequate	H.7	Adequate	M.4	Adequate/Corr
A.1.d	Adequate	H.10	Adequate/Corr	N.1.a	Adequate
A.1.e	Adequate	H.11	Adequate/Corr	N.1.b	Adequate
A.2.a	Adequate	H.12	Adequate	N.2.a	Adequate/Corr
A.2.b	Adequate	I.7	Adequate	N.2.c	Inadequate
A.3	Adequate/Corr.	I.8	Adequate/Corr.	N.2.d	Adequate
A.4	Adequate	I.9	Adequate/Corr.	N.2.e	Adequate
C.1.a	Adequate	I.10	Adequate/Corr.	N.3.a	Adequate
C.1.b	Adequate	I.11	Adequate	N.3.b	Adequate
C.1.c	Adequate	J.2	Adequate/Corr	N.3.c	Adequate
C.2.a	Adequate	J.9	Adequate/Corr.	N.3.d	Adequate
C.3	Adequate/Corr.	J.10.a	Adequate/Corr.	N.3.e	Adequate
C.4	Adequate/Corr.	J.10.b	Adequate/Corr.	N.3.f	Adequate
D.3	Adequate	J.10.c	Adequate/Corr.	N.4	Adequate
D.4	Adequate	J.10.d	Adequate/Corr.	N.5	Adequate/Corr.
E.1	Adequate	J.10.e	Adequate/Corr.	O.1	Adequate
E.2	Adequate/Corr.	J.10.f	Adequate/Corr.	O.1.b	Adequate/Corr.
E.5	Adequate/Corr.	J.10.g	Adequate/Corr.	O.4.a	Adequate/Corr.
E.6	Adequate/Corr.	J.10.h	Adequate/Corr.	O.4.b	Adequate
E.7	Adequate/Corr.	J.10.i	Adequate/Corr.	O.4.c	Adequate/Corr.
F.1.a	Adequate	J.10.j	Adequate	O.4.d	Adequate/Corr.
F.1.b	Adequate	J.10.k	Adequate/Corr.	O.4.f	Adequate/Corr.
F.1.c	Adequate	J.10.l	Adequate/Corr.	O.4.g	Adequate/Corr.
F.1.d	Adequate	J.10.m	Adequate	O.4.h	Adequate/Corr.
F.1.e	Adequate/Corr.	J.11	Adequate/Corr.	O.4.j	Adequate/Corr.
F.2	Adequate/Corr.	J.12	Adequate/Corr.	O.5	Adequate
F.3	Adequate	K.3.a	Adequate/Corr.	P.1	Adequate/Corr.
G.1	Adequate/Corr.	K.3.b	Adequate	P.2	Adequate
G.2	Adequate/Corr.	K.4	Adequate/Corr.	P.3	Adequate
G.3.a	Adequate	K.5.a	Adequate/Corr.	P.4	Adequate/Corr.
G.4.a	Adequate	K.5.b	Adequate/Corr.	P.5	Adequate/Corr.
G.4.b	Adequate	L.1	Adequate/Corr.	P.6	Adequate/Corr.
G.4.c	Adequate	L.3	Adequate/Corr.	P.7	Adequate/Corr.
G.5	Adequate/Corr.	L.4	Adequate/Corr.	P.8	Adequate/Corr.
				P.10	Adequate/Corr.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

- A. Assignment of Responsibility (Organization Control) Planning Standard:**
Primary responsibilities for emergency response by the nuclear facility licensee, and by State and local organizations within the Emergency Planning Zone have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

A. Evaluation: Adequate – corrections must be made.

The plans provided for review meet all but one of the evaluation criteria under Planning Standard A in NUREG-0654/FEMA-REP-1, Rev. 1. Elements of all nine evaluation criteria are addressed in the plans.

Each plan identifies the organizations that are intended to be part of the overall response [A.1.a]; specifies the concept of operations of those organizations and their relationship to the total effort [A.1.b]; illustrates these interrelationships in a block diagram [A.1.c]; identifies the specific individual (by title) who is in charge of the emergency response [A.1.d]; and provides for 24-hour per day emergency response including the manning of communications links [A.1.e]. The individual responsible for assuring continuity of resources is specified, by title, in each plan [A.4]. In addition, each plan specifies the functions and responsibilities for major elements and key individuals and summarizes this information in a table showing primary and support responsibilities for each agency [A.2.a]. Each plan contains the legal basis for the authorities detailed in the plan [A.2.b].

The criterion that is not fully adequate is A.3 which requires that written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones be provided in an appendix to the plans. Alternatively, the plans may contain descriptions of the emergency measures to be provided, the criteria for the implementation of the written agreements, and the arrangements for exchange of information. Written agreements are alluded to in the Commonwealth of Virginia's Radiological Emergency Response Plan (COVRERP), Attachment 1, *Supporting Plans, Memoranda of Understanding, Standing Operating Procedures and Public Affairs Publications*, as well as in the risk counties' Radiological Emergency Response Plans (RERPs), Attachment 14, *Support Agreements*; however, the written agreements are not provided or described in the plans. [RAI: North Anna – 001]

The written agreements in the COL Application state that the signature organizations have reviewed the plans and procedures for the COL and commit to further participating in the emergency plan for the new reactor. These are not the written agreements referred to in NUREG-0654/FEMA-REP-1, Rev. 1, evaluation criterion A.3.

To become fully compliant with the Planning Standard A, written agreements must be either provided in the plans or described in the plans as detailed in evaluation criterion A.3 and Guidance Memorandum (GM) 5, Revision 1, *Agreements Among Governmental Agencies and Private Parties*, October 19, 1983.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

B. Onsite Emergency Organization Planning Standard: *On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.*

B. Evaluation: N/A; there are no assigned offsite responsibilities for this planning standard.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

C. Emergency Response Support and Resources Planning Standard:
Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the Licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

C. Evaluation: Adequate – corrections must be made.

The plans provided for review meet four of the six evaluation criteria under Planning Standard C in NUREG-0654/FEMA-REP-1, Rev. 1. Elements of all six evaluation criteria are addressed in the plans.

The specific person authorized to request Federal assistance is detailed in the COVRERP [C.1.a]. The Federal resources expected are detailed in the COVRERP and the Virginia Department of Health/Division of Radiological Health (VDH/DRH) Emergency Response Plan (ERP) [C.1.b]. The State and local resources available to support the Federal response are specified in the COVRERP and the risk counties' RERPs [C.1.c]. Virginia Department of Emergency Management (VDEM) and VDH/DRH send representatives to the NAPS Emergency Operations Facility [C.2.a].

Two evaluation criteria, C.3 and C.4, are not adequately addressed in the reviewed plans. Radiological laboratories are identified in support of evaluation criterion C.3 in COVRERP, Appendix 2, *Task Assignments*, and Annex H, *ESF #8, Public Health and Medical Services*, and in VDH/DRH ERP Appendix 5, *Accident Assessment*. However, the plans do not indicate the general capabilities and expected availability of the primary and backup laboratories. [RAI: North Anna – 002]

The COVRERP and risk counties' RERPs identify facilities and organizations that can be relied upon in an emergency to provide assistance. However, the appropriate letters of agreement with these facilities and organizations are not included in the plans or detailed in the plans as required by evaluation criterion C.4. This is the same concern detailed under evaluation criterion A.3. [RAI: North Anna – 001]

To become fully compliant with the Planning Standard C, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

- D. Emergency Classification System Planning Standard:** *A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by the facility licensees for determinations of minimum initial offsite response measures.*

D. Evaluation: Adequate.

The plans provided for review meet both of the evaluation criteria under Planning Standard D in NUREG-0654/FEMA-REP-1, Rev. 1.

All plans establish an emergency classification level scheme that is consistent with that established by NAPS. [D.3] The protective actions consistent with the licensee recommendations based on the emergency classification level are detailed in the plans and include evacuation and sheltering-in-place. [D.4]

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

E. Notification Methods and Procedures Planning Standard: *Procedures have been established for notification, by the licensee of State and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow-up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.*

E: Evaluation: Adequate – corrections must be made.

The plans provided for review do not meet four of the five evaluation criteria under Planning Standard E in NUREG-0654/FEMA-REP-1, Rev. 1. Elements of all five evaluation criteria are addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

Procedures are established in the COVRERP and the risk counties' RERPs which describe the notification by Dominion Power of the offsite response organizations consistent with the emergency classification [E.1].

In accordance with evaluation criterion E.2, the COVRERP and risk counties' RERPs state that procedures have been established for alerting, notifying, and mobilizing emergency response personnel; however, the risk counties' procedures were not included for review. For the risk counties, the *Communications Procedure* and *Emergency Management Procedure* appendices state that the Dispatcher or Communications Officer receiving notification from Dominion Power of an emergency declaration at NAPS will contact the Emergency Services Coordinator (or equivalent) or his backup. Both appendices reference an attachment for "Notification for an ALERT Declaration" for the alert, notification, and mobilization of emergency response personnel. This attachment is not included in any of the local plans and could not be reviewed. [RAI: North Anna – 003]

Evaluation criterion E.5 requires that a system for disseminating appropriate information to the public be established. Virginia and the risk counties have established such a system; however, not all population groups, particularly those individuals with special needs have been adequately addressed in this dissemination. In Section VII, *Organization*, for each county RERP, a department is identified that will maintain a list of special needs individuals. Procedures for identifying these individuals and for notifying them of an accident and providing them with appropriate information are not included in the plans as required by GM-24, *Radiological Emergency Preparedness for Handicapped Persons*, April 5, 1984. [RAI: North Anna – 004]

A siren system has been established as the primary system to alert the public within 10 miles of NAPS as required by evaluation criterion E.6. The sirens are radio-controlled. The primary activation point is the Louisa County Communications Center and the alternate activation point is the Spotsylvania County Communications Center – 911 Center. Primary route alerting [should also indicate “exception area route alerting”] will be used to notify those areas that are not covered by sirens; these routes are provided in the plans. In each county RERP, Section VIII.D, *Concept of Operations, Alerting*, it states that backup route alerting will be performed if all or part of the siren system fails to function. Information for routes corresponding to failed sirens was not provided for review. [RAI: North Anna – 005]

Evaluation criterion E.7 requires that each organization provide written messages intended for the public. These draft messages are included in both the COVRERP and in the county RERPs. The county RERPs include a message about the use of potassium iodide (KI); however, the COVRERP is missing this message in Annex M, *Public Information*. Appendix 8, *Potassium Iodide (KI) Administration*, states that protective action decisions regarding KI will be broadcast to the general public using the EAS and the news releases regarding the use of KI will be issued. [RAI: North Anna – 006]

To become fully compliant with the Planning Standard E, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

F. Emergency Communications Planning Standard: *Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.*

F. Evaluation: Adequate – corrections must be made.

The plans provided for review meet five of the seven evaluation criteria under Planning Standard F in NUREG-0654/FEMA-REP-1, Rev. 1. Two of the evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard:

The communications plans for emergencies are addressed in the COVRERP and risk counties' RERPs. There is a provision for 24-hour per day notification [F.1.a]; a provision for communications with contiguous State/local governments within the Emergency Planning Zones [F.1.b]; a provision for communications with Federal emergency response organizations [F.1.c]; and a provision for communications between NAPS and the State and local Emergency Operations Centers and radiological monitoring teams [F.1.d]. Each plan also addresses periodic testing of the entire emergency communications system [F.3].

A provision for alerting and activating emergency personnel in each response organization is partially addressed [F.1.e]. However, the procedure for mobilizing emergency personnel in the risk counties was not provided for review. [See evaluation criterion E.2 and RAI: North Anna – 003.]

Evaluation criterion F.2 requires that a coordinated communication link for fixed and mobile medical support facilities exists.

COVRERP states that the Virginia Department of Health (VDH) has the responsibility to ensure adequate communication exists between medical facilities, ambulances, and EOCs for radiological emergencies at NAPS. Descriptions of Emergency Medical Communication links for emergency medical operations during a radiological emergency are provided in Appendix 10, *Communications*. Information is provided on Ambulance – Hospital, Hospital – Hospital, VDEM mobile command vehicles – Hospital and EMS agencies, and Hospital – EOC communications. The primary links consist of radios (mobile and base stations); back-up systems are not specified. The radio frequencies used throughout Central Virginia are listed along with the EMS District, Regional, and Statewide frequencies.

In the paragraph describing the Ambulance – Hospital communications, there is a statement that “direct communications from the North Anna Station to the University Of Virginia Hospital ... are possible with the system.” However, the University of Virginia

Hospital (UVA) is not listed as the primary or back-up hospital for NAPS. No specific information for the NAPS area communications with the Medical College of Virginia (MCV) (primary) or the Mary Washington Hospital (back-up) is given.

For the Hospital – EOC Communications, it states that radio contact through the regional mobile relay system is possible from the Louisa County Sheriff's Department to UVA in Charlottesville and that the Virginia EOC can directly contact UVA and MCV via radio.

The VDH/DRH ERP and the risk counties RERPs do not address Emergency Medical Communications directly. VDH/DRH states that primary communications will be by radio with back-up by commercial telephone. In each risk county plan, it states that fixed locations will use commercial telephone lines as primary communications. Mobile units will use the appropriate local government radio frequency. RACES is listed as the backup communications between fixed facilities. No backup communication is listed in any of the county RERPs for ambulances.

The communications system described in the COVRERP does not have the proper hospitals included and is not addressed in the risk counties' RERPs. [RAI: North Anna – 007]

To become fully compliant with the Planning Standard F, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

G. Public Education and Information Planning Standard: *Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.*

G. Evaluation: Adequate – corrections must be made.

The plans provided for review meet four of the seven evaluation criteria under Planning Standard G in NUREG-0654/FEMA-REP-1, Rev. 1. The three remaining evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

Each plan designates a point of contact and the Joint Information Center (JIC) for use by the news media during an emergency [G.3.a]. A designated spokesperson, who has access to all necessary information, is given in all of the plans [G.4.a]. Arrangements are included in the plans for the timely exchange of information among those designated spokespersons [G.4.b]. Public Inquiry (Rumor Control) functions are described in all of the plans [G.4.c].

A coordinated periodic dissemination of information to the public regarding the items noted in evaluation criterion G.1 is noted in each plan with the counties stating that they will participate in the Commonwealth and Dominion Power in this effort (COVRERP, Appendix 9, *Public Information*; risk counties' RERPs, Section IX.C.1, *Direction and Control, Public Information, Non-Emergency Periods*). The information disseminated to the public was not provided for review. Information for special needs individuals and special population groups is not addressed in the COVRERP. [RAI: North Anna – 008]

In accordance with evaluation criterion G.2, the public information program shall provide the permanent and transient adult population within the plume exposure EPZ an adequate opportunity to become aware of the information. The plans state that the information will be provided to transients by way of yellow page advertisements. There is no mention of whether or not there are additional means of providing public information to the transient population, how that information is assessed to determine if it is current, how that information is updated when necessary, what notices or postings may be available, and where these notices or postings are located. [RAI: North Anna – 009]

At least annually, each organization is to conduct a program to acquaint news media with appropriate information as required by evaluation criterion G.5. There are no references to an annual media briefing in the COVRERP. Each local RERP states that they will

participate in an annual briefing of the local news media in conjunction with the Utility and State. [RAI: North Anna – 010]

To become fully compliant with the Planning Standard G, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

H. Emergency Facilities and Equipment Planning Standard: *Adequate emergency facilities and equipment to support the emergency response are provided and maintained.*

H. Evaluation: Adequate – corrections must be made.

The plans provided for review meet three of the six evaluation criteria under Planning Standard H in NUREG-0654/FEMA-REP-1, Rev. 1. The three remaining evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

Each plan gives the location and staffing requirements for an Emergency Operations Center (EOC) [H.3]. All plans detail the radiological monitoring equipment that is provided by VDH/DRH to the risk counties [H.7]. As stated in the plans, the central point for the receipt and analysis of all field monitoring data and coordination of sample media is the VDH/DRH representative at the EOF [H.12].

Evaluation criterion H.4 states that each organization shall provide for timely activation and staffing of the facilities and centers described in the plan. Information is given in evaluation criteria E.2 and F.1.e for activation and staffing of the EOCs. For Evacuation Assembly Centers (EACs), the risk counties' RERPs give general instructions in the *Emergency Management Procedure* that "all appropriate persons and organizations" staffing the EACs are to be notified. No further information on the notification and activation procedure is provided. [RAI: North Anna – 011]

Under the provisions of evaluation criterion H.10, VDH/DRH will calibrate and maintain the radiological equipment annually and will pre-positioned equipment at local jurisdictions and provide addition equipment, as needed. Equipment inventory and maintenance is assigned to the local emergency services department (Section VII.A in the plans); however, there is no procedure for performing the quarterly inventory and operational checks. [RAI: North Anna – 012]

Evaluation criterion H.11 requires that each plan contain a listing of emergency kits covering protective equipment, communications equipment, radiological monitoring equipment and emergency supplies. However, not all categories are covered in the reviewed plans. A full inventory of the survey and dosimetry equipment in each county is not contained in the county plans. [RAI: North Anna – 013]

To become fully compliant with the Planning Standard H, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

I. Accident Assessment Planning Standard: Adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

I. Evaluation: Adequate – corrections must be made.

The plans provided for review meet two of the five evaluation criteria under Planning Standard I in NUREG-0654/FEMA-REP-1, Rev. 1. The three remaining evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

The plans describe the capability and resources for field monitoring activities within the plume exposure EPZ. VDH/DRH has the responsibility for beta/gamma measurements, air sampling, surface water sampling, and crop sampling. The risk counties are responsible for beta/gamma measurements [I.7]. VDH/DRH, Dominion Power, and Federal personnel, if necessary and available, will locate and track the airborne radioactive plume [I.11].

Evaluation criterion I.8 requires detailed procedures for radiological assessment teams (both field-based and facility based). The county RERPs include such procedures; but, detailed procedures for VDH/DRH personnel were not provided for review. [RAI: North Anna – 014]

The VDH/DRH ERP indicates that the field monitoring teams have the capability to detect iodine in the presence of noble gas at levels of 10^{-7} uCi/cc through the use of air samplers with silver zeolite cartridges as required by evaluation criterion I.9. However, the detailed procedures justifying this claim were not provided for review. [RAI: North Anna – 015]

The dose assessment functions delineated in evaluation criterion I.10 will be performed by VDH/DRH; however, no procedures were provided for performing these dose assessment functions. [RAI: North Anna – 016]

To become fully compliant with the Planning Standard I, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

J. Protective Response Planning Standard: *A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate (66 FR 5427). Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.*

J. Evaluation: Adequate – corrections must be made.

The plans provided for review meet two of the seventeen evaluation criteria under Planning Standard I in NUREG-0654/FEMA-REP-1, Rev. 1. All of the other evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard:

Control of access to evacuated areas and the organization responsibilities for such control are given in each of the plans [J.10.j] and are primarily the responsibility of local law enforcement. The bases of the choice of recommended protective actions are summarized in each plan and are consistent with the guidance issued by the Environmental Protection Agency [J.10.m].

Evaluation criterion J.2 addresses the evacuation of onsite personnel to offsite locations. COVRRP, Section VIII, D.1, *Concept of Operations, Accidents at Fixed Nuclear Facilities* states that protective actions within the facility site boundary will be the responsibility of the operator and that the State and neighboring local governments will provide onsite assistance as requested and as mutually agreed to with the facility operator. Neither the COVRRP nor the local RERPs address the assistance that may be needed during an evacuation of onsite personnel, the locations of the primary remote assembly area (near Mineral, Virginia, in Louisa County) and the secondary remote assembly area (at North Anna Dam in Spotsylvania County). [RAI: North Anna – 017]

Evaluation criterion J.9 requires that the State and local organizations establish a capability for implementing protective measures based upon protective action guides and other criteria for both the plume exposure pathway and for the ingestion exposure pathway. Information is contained in the COVRRP, VDH/DRH ERP, and county RERPs describing the process and timeframe for making initial Protective Action Decisions (PADs) on the basis of Licensee notification of plant status and Licensee Protective Action Recommendations (PARs) for most of the plume exposure pathway. However, none of the plans contain predetermined public PADs based on plant conditions, information on the decision levels for ingestion pathway protective actions, or the implementation procedures at the local level for ingestion pathway protective actions.

The State of Maryland has one county (Charles County) within the 50-mile ingestion pathway planning zone; however, the State's plan and procedures were not provided for review. [RAI: North Anna – 018]

Evaluation criteria J.10.a through J.10.m require a number of items concerning the implementation of protective measures for the plume exposure pathway. All but two of these items are incomplete in the reviewed plans. Those that need corrections are summarized below:

- J.10.a: Maps are provided in the COVRERP and county RERPs. However, for the COVRERP, pre-selected radiological sampling and monitoring points and the locations of the EACs and special facilities are not included on the maps. In addition, the evacuation routes are not clearly labeled in the COVRERP. The Louisa County RERP maps for the evacuation routes are not legible. None of the county RERPs contain maps showing the EACs, towns, or special facilities. [RAI: North Anna – 019]
- J.10.b: Maps provided in the COVRERP and the county RERPs are supplemented with tables showing the population in the Protective Action Zones (PAZs); however, no information is included on the location of special facilities and recreation areas and the populations for each. Also, the updated Evacuation Time Estimate (from 2007) has not been incorporated into the plans. [RAI: North Anna – 020]
- J.10.c: The means for notifying all segments of the resident and transient population are addressed under evaluation criteria E.5, E.6, and E.7. [RAI: North Anna – 004, 005, and 006]
- J.10.d: In the county RERPs, Section V.D, *Situation, Protection Against the Hazard*, the plans state that those persons requiring transportation will be identified before or at the time of the emergency and will be provided transportation if an evacuation is needed. Specific transportation resources (types and quantities) for moving individuals with special needs are not addressed in the plans; however, general guidelines are given (such as, arrange for ambulance or bus pickup, as needed). The plans address the option of shelter-in-place for those persons who can not be moved. [RAI: North Anna – 021]
- J.10.e: Responsibility for distribution, procurement, storage, maintenance, and replacement of KI will be shared between the VDH and the Local Health Departments (LHD) according to the COVRERP, Appendix 8, *Potassium Iodide (KI) Administration* and local RERPs, Appendix 8, *Public Health Procedure*. No actual quantities, specific storage locations, or storage conditions are listed. [RAI: North Anna – 022]
- J.10.f: According to COVRERP, Appendix 8, *Potassium Iodide (KI) Administration*, responsibility for the decision making process for the ingestion of KI by the general public and emergency workers will lie with the VDH based on the assessment of radiological consequences of the event, relating them to protective action guides, and discussing/evaluating utility protective action recommendation on use of KI for the public. The State Health Commissioner may recommend or advise KI to be ingested by the general public and emergency workers when a dose assessment predicts a thyroid exposure threshold of 5 rem or

if an actual measurement of 5 rem is obtained offsite. Throughout the COVRERP, VDH/DRH ERP, and county RERPs, the threshold is sometimes given as 5 rem and sometimes as 25 rem. [RAI: North Anna – 023]

- J.10.g: COVRERP, Appendix 5, *Emergency Response*, Tab B, *Population at Risk and Protective Actions* states that local plans will address residents, institutionalized persons, and transients in planning and when protective actions are instituted. Specific information will be developed by local governments of individuals who are without transportation. Protective actions to be taken include sheltering and evacuation. The method for determining the number of persons who may need assistance for each planning area is not specified in the plans, but it may be based on the number of non-auto owning households for each county (county RERP, Attachment 8, *Permanent Resident Population Data by County within NPS-10-mile EPZ*). This data is no longer current based on the updated Evacuation Time Estimate conducted by KLD and Associates, 2007. [RAI: North Anna – 024]
- J.10.h: COVRERP, Appendix 5 *Emergency Response* states that EACs will be established and operated by local governments or by nearby political subdivisions through mutual support agreements. The State will provide support on request. A listing of the EACs in each County is provided in Annex F, *Mass Care, Housing, and Human Services*, Tab B. All of the EACs are located beyond 15 miles of a fixed nuclear facility. The county RERPs have similar listings. None of the plans provide the address for the EACs, their capacities, and whether they are accessible to individuals with disabilities. In addition, Patrick Henry High School is listed as a host school (only) for Louisa County in some places and as a primary EAC in others. There is also an inconsistency between the COVRERP and Orange County RERP, Appendix 3, *Mass Care ESF Procedure*, which lists Gordon-Barbour Elementary School as a host reception center for Louisa County and does not list Orange County High School as an EAC. Orange County also does not designate the lead organization for managing the EAC. [RAI: North Anna – 025]
- J.10.i: COVRERP, Appendix 5 *Emergency Response*, Attachment 6 to Tab B, *Emergency Response, North Anna Power Station (NAPS)*, provides a summary of the Evacuation Time Estimate (ETE) for the NAPS area, conducted by Innovative Emergency Management, 2001. Traffic capacity of the evacuation routes is not addressed. The local plans for the five Counties provide the same information in Attachment 11, *Evacuation Time Estimates for the North Anna Power Station Area*, to the basic plan. The ETE Study was revised and updated by KLD and Associates, October 2007. The study was substantially revised from the previous study. Included in the study is traffic capacity of the evacuation routes and local maps. [RAI: North Anna – 026]
- J.10.k: The organization responsibility for dealing with potential impediments is addressed in four of the county plans. Caroline, Hanover, Louisa, and Spotsylvania County each assign the responsibility for dealing with potential impediments to Local Law Enforcement in the *Law Enforcement ESF Procedure*. The Orange County RERP does not specifically address responsibility for this criterion. In the plans that do assign responsibility, they do not identify the

resources available (manpower and equipment resources) that will be used to clear impediments in the event of an emergency. [RAI: North Anna – 027]

- J.10.1: COVRERP, Appendix 5 *Emergency Response*, Attachment 6 to Tab B, *Emergency Response, North Anna Power Station (NAPS)*, provides a summary of the Evacuation Time Estimate (ETE) for the NAPS area, conducted by Innovative Emergency Management, 2001. The five county plans also summarize the Innovative Emergency Management, 2001 study. The results summary does not include time estimates for evacuation of special populations. Population data was updated and the scenarios to calculate evacuation time estimates were revised from the previous study and include time estimates for evacuation of special populations. [RAI: North Anna – 028]

Evaluation criterion J.11 requires detailed information for the protective measures that would be taken for the ingestion-pathway. The COVRERP assigns (in Appendix 2, *Task Assignments*, and Annex J, *ESF #11 – Agriculture and Natural Resources*) some of the responsibilities listed in the criterion and GM IN-1, *The Ingestion Exposure Pathway*, February 26, 1988; however, not all of them are addressed. The VDH/DRH ERP lists Standing Operating Procedures in Appendix 17 for the post-plume phase; however, these procedures were not provided for review. The State of Maryland RERP for ingestion pathway activities was not provided for review. [RAI: North Anna – 029]

A description of the registering and monitoring of evacuees at relocation centers is required under evaluation criterion J.12. As an initial screening for contamination, all county RERPs reference the use of portal monitors. The procedure for source checking these instruments (contained in the Mass Care Procedure of the county RERPs) is incorrect; it is not procedure recommended in FEMA-REP-21, *Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response*, March 1995. [RAI: North Anna – 030]

To become fully compliant with the Planning Standard J, information must be provided to address all of the areas detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

K. Radiological Exposure Control Planning Standard: *Means for controlling radiological exposures, in an emergency, is established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.*

K. Evaluation: Adequate – corrections must be made.

The plans provided for review meet one of the five evaluation criteria under Planning Standard I in NUREG-0654/FEMA-REP-1, Rev. 1. All of the other evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

All of the plans instruct emergency workers to read their dosimeters at 30 minute intervals and record these readings on a standardized form. Instructions are provided on maintaining these records. [K.3.b]

Evaluation criterion K.3.a requires that administrative exposure limits be set so that doses received by emergency workers can be determined. Provisions are in place for the distribution of dosimeters and the use of a dosimeter correction factor to determine the dose (in Rem) from the exposure (in Roentgen). Throughout the COVRERP, VDH/DRH ERP; and the county RERPs, these exposure limits are inconsistent and often stated in the wrong units (Rem instead of Roentgen). [RAI: North Anna – 031]

A decision chain for authorizing emergency workers to incur exposure in accordance with the EPA dose limits for emergency workers has been established in accordance with evaluation criterion K.4; however, the VDH/DRH procedure for this authorization was not provided for review. At the county level, information for bus drivers, including exposure briefing information and the authorization process is not detailed. The authorization process for county field monitoring teams is also not detailed. [RAI: North Anna – 032]

Evaluation criterion K.5.a requires that an action level for determining the need to decontamination emergency personnel and equipment be specified. Action levels and monitoring procedures are provided for personnel, but they are not provided for the interior of vehicles used by emergency personnel. [RAI: North Anna – 033]

Evaluation criterion K.5.b requires establishment of the means for radiological decontamination and for waste disposal. The county *Evacuation Assembly Center Operation Procedures* list the equipment and supplies that are available to perform decontamination of personnel, equipment, and the exterior of vehicles. The location of the secured waste/contaminated articles and equipment storage area is not identified.

There is also not provision for emergency workers to doff their protective clothing prior to being monitored for contamination. [RAI: North Anna – 034]

To become fully compliant with the Planning Standard K, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

L. Medical and Public Health Support Planning Standard: *Arrangements are made for medical services for contaminated injured individuals.*¹

L. Evaluation: Adequate – corrections must be made.

The plans provided for review did not fully meet any of the three evaluation criteria under Planning Standard I in NUREG-0654/FEMA-REP-1, Rev. 1. All of the other evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

For evaluation criterion L.1, each organization is to arrange for local and backup hospital and medical services for contaminated injured individuals. COVRERP, Annex H, *ESF #8, Public Health and Medical Services, Tab A, Hospitals*, specifies that the Medical College of Virginia (MCV) Hospital, in Richmond, will act as the primary hospital and Mary Washington Hospital, in Fredericksburg, will act as the backup hospital for an individual that is both contaminated and injured. It is indicated that MCV has a Radiation Emergency Plan and SOP for medical plans and procedures. There is no such indication for Mary Washington Hospital. Plans and procedures were not provided for review. The county RERPs do not list primary and backup hospitals for contaminated injured individuals. [RAI: North Anna – 035]

COVRERP, Annex H, *ESF #8, Public Health and Medical Services, Tab A, Hospitals* includes a list of “other hospitals with radiological response capabilities” as required by evaluation criterion L.3. However, it also states that some of the hospitals listed do not have radiation detection equipment (arrangements have been made with VDEM to supply detection equipment to those hospitals, when needed). It is not stated how hospitals that do not have detection equipment can have radiological response capabilities. The COVRERP does not provide any other details about the listed hospitals contrary to the evaluation criteria requirements. [RAI: North Anna – 036]

Evaluation criterion L.4 requires that each organization arrange for transporting victims of radiological accidents to medical support facilities. Only the Louisa County RERP provides any information on the transport of contaminated individuals. In Appendix 10, *Firefighting ESF Procedure*, it states that a Dominion Health Physicist will be available to the rescue squad to ride with the ambulance to the hospital and will conduct all monitoring of the patient. However, information is not provided on the procedure that

¹ The availability of an integrated emergency medical services system and a public health emergency plan serving the area in which the facility is located and, as a minimum, equivalent to the Public Health Service Guide for Developing Health Disaster Plans, 1974, and to the requirements of an emergency medical services system as outlined in the Emergency Medical Services System Act of 1973 (PL 93-154 and amendments in the 1979 PL 96-142), should be a part of and consistent with overall State or local disaster control plans and should be compatible with the specific overall emergency response for the facility.

will be used if the contaminated injured individual is a member of the public and not being transported from NAPS. No information is provided in any of the other counties on transport of contaminated injured individuals. [RAI: North Anna – 037]

To become fully compliant with the Planning Standard L, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

**M. Recovery and Reentry Planning and Post-accident Operations Planning
Standard: *General plans for recovery and reentry are developed.***

M. Evaluation: Adequate – corrections must be made.

The plans provided for review did not fully meet any of the three evaluation criteria under Planning Standard I in NUREG-0654/FEMA-REP-1, Rev. 1. All of the other evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

General plans and procedures for reentry and recovery are required under evaluation are M.1. The COVRERP, Appendix 11 *Decontamination, Re-Entry, Return and Recovery*, provides these general plans and procedures; however, there is no mention of the procedures necessary for relocating people or households that were not evacuated but that may be in contaminated areas. The dose levels given in the plan incorrectly state that the 50-year committed dose excludes the first and second year (this is contrary to the EPA guidelines). The COVRERP also states that the decision to allow reentry and return rests with the Director of Emergency Services of the local jurisdiction; but, there are no local plans/procedures that address this decision. The VDH/DRH ERP indicates that there are procedures for the determination of committed doses and recommendation of protective actions; these procedures were not provided for review. [RAI: North Anna – 038]

The COVRERP states that offsite emergency operations will be coordinated from the Virginia EOC. The plan does not specify the means that will be used to keep all involved response organizations informed of the recovery phase activities or changes that might take place in the organizational structure as required by evaluation criterion M.3. [RAI: North Anna – 039]

Evaluation criterion M.4 requires that the State plan establish a method for periodically estimating total population exposure. There is no information about how the State will estimate the total population exposure from all pathways caused by the accident. [RAI: North Anna – 040]

To become fully compliant with the Planning Standard M, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

N. **Exercises and Drills Planning Standard:** *Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.*

N. Evaluation: Adequate – corrections must be made. One criterion, N.2.c, is rated as Inadequate.

The plans provided for review meet ten of the thirteen evaluation criteria under Planning Standard I in NUREG-0654/FEMA-REP-1, Rev. 1. Two of the other three evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard. One evaluation criteria is not addressed in the local plans.

The plans provide for biennial exercises at NAPS conducted as set forth in NRC and FEMA rules and guidelines [N.1.a]. These exercises will include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario; observation and critique by qualified personnel from Federal, State, or local governments; varied scenarios such that all major elements of the plans and preparedness organizations are tested within a six year period; provisions to start an exercise between 6:00 p.m. and 6:00 a.m. or on the weekend once every six years; varied weather conditions; and some exercises will be unannounced [N.1.b].

The plans describe how exercises and drills are to be carried out and the requirements for those exercises and drills in accordance with evaluation criteria N.3.a, b, c, d, e, and f. They also state that qualified observers from Federal, State, or local governments will observe and critique exercises or drills [N.4].

Evaluation criteria N.2 address periodic drills. Two of the drills are adequately detailed in the plans: radiological monitoring drills [N.2.d] and health physics drills [N.2.e]. The plan weaknesses for the other two types of drills, communications and medical emergency drills, are described below.

Evaluation criterion N.2.a details the requirements for monthly communication drills including the aspect of understanding the content of messages. The COVRERP, Appendix 13, *Training and Exercises*, specifies that communication between the nuclear facility, the state and local governments within the plume exposure pathway EPZ will be tested daily. Each County's RERP, Basic Plan, Section XII, *Training, Drills and Exercises*, specifies that monthly drills will check the systems used for communications between State and local governments. This monthly communications check is inconsistent with the provisions of the COVRERP that specify a daily communications test between the nuclear facility, State and local governments within the plume exposure

pathway EPZ. Also, the COVRERP and County RERPs do not address the requirement of this criterion ensure that the nature of the messages that are likely to be transmitted in an emergency will be understood by the receiving organization. [RAI: North Anna – 041]

Evaluation criterion N.2.c requires that a medical emergency drill involving a simulated contaminated individual be conducted to ensure participation by the local support services agencies. The county RERPs provide no information regarding the conduct of medical emergency drills and their responsibilities for transportation. This plan content addressing this criterion has been rated as inadequate. [RAI: North Anna – 042]

Evaluation criterion N.5 requires that each organization establish the means for evaluating observer and participant comments and establish the means to ensure that corrective actions are implemented. Neither the COVRERP nor the county RERPs describe the details of the process for correcting issues identified during exercises. [RAI: North Anna – 043]

To become fully compliant with the Planning Standard N, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

O. Radiological Emergency Response Training Planning Standard: *Radiological emergency response training is provided to those who may be called on to assist in an emergency.*

O. Evaluation: Adequate – corrections must be made.

The plans provided for review meet three of the eleven evaluation criteria under Planning Standard I in NUREG-0654/FEMA-REP-1, Rev. 1. All of the other evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

The plans provide for the training of appropriate individuals [O.1]; however, information is not provided on the training of personnel that are part of mutual aid agreements as required by evaluation criterion O.1.b. [RAI: North Anna – 044].

The scope of the training programs for all of the categories listed under O.4, except accident assessment [O.4.b], is not detailed in the plans. [RAI: North Anna – 045]

The plans do provide for initial and annual retraining of response personnel [O.5].

To become fully compliant with the Planning Standard O, information must be provided to address items detailed above.

**Review and Evaluation against Planning Standards and Evaluation Criteria of
NUREG-0654/FEMA REP-1, Rev. 1**

(Evaluation elements applicable only to utilities are not listed.)

- P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans Planning Standard: *Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.***

P. Evaluation: Adequate – corrections must be made.

The plans provided for review meet two of the nine evaluation criteria under Planning Standard F in NUREG-0654/FEMA-REP-1, Rev. 1. All of the other evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard.

Each organization identifies the individual with the overall authority and responsibility for radiological emergency response planning [P.2] and designates an Emergency Planning Coordinator with responsibility for the development and updating of the plans and coordinating them with other response organizations [P.3]. These individuals are identified at the State and local emergency management level, but not in the lower agencies.

Evaluation criterion P.1 requires that training be provided to the individuals responsible for the planning effort. COVRERP, Appendix 13 *Training and Exercises* II.E.5 *Operational Concepts and Procedures, Training* states that “key planners will be sent to the Radiological Emergency Planning Course at the Emergency Management Institute (EMI).” Key planners for radiological emergency response are not clearly identified. The risk counties RERPs assign the responsibility for plan development and training to the Department or Office of Emergency Management or Services; the specific training necessary for plan development and maintenance is not included as part of the plan. [RAI: North Anna – 046]

Evaluation criterion P.4 states that each organization shall update its plan and agreements, as needed, and review and certify it to be current on an annual basis. The update is to take into account changes identified by drills and exercises. The plans state that these activities will be done; however, there is not a procedure that details how it will be done and there is no indication that changes has been made. For example, the Record of Changes, located in the plan in front of the Table of Contents of the COVRERP, indicates, per Change Number 14 that the plan was updated in May 2007; however, there is no summary of the changes made or markings or equivalent visual indications on revised pages showing where changes were made (see also evaluation criterion P.5). The COVRERP does not contain a reference to the latest exercise report, nor does it reference issues and responses from previous drills and exercises. The VDH/RHP, Appendix 12 *Training and Exercises*, Section 1.0 *Purpose* states that VDH/DRH, through training, exercises and review, will ensure that their plan and procedures are updated annually.

There is no summary of changes made from previous versions of the plan nor markings or equivalent visual indications on revised pages showing where changes were made (see also evaluation criterion P.5). The county RERPs each contain a Record of Changes table; however, the table is blank. There is no reference to the latest exercise report or issues and responses from previous drills and exercises. [RAI: North Anna – 047]

In addition to distributing the plans to the appropriate organizations and individuals, updated plans should indicate revised pages by a date and markings to show where revisions have been made [P.5]. The COVRERP and VDH/DRH ERP do not state that revisions are to be marked and dated and do not list what agencies or organizations are to receive the plans. The county RERPs do provide for those indications. [RAI: North Anna – 048]

A detailed listing of supporting plans and their source is necessary for evaluation criterion P.6. None of the plans include information about school plans, hospital plans, or other special facility plans. [RAI: North Anna – 049]

An appendix listing the procedures required to implement the plan and the section being implemented is required by evaluation criterion P.7. Although there are listings of procedures, the sections of the plans being implemented are not included. In addition, there are some procedures that are not listed, but are referenced in other procedures. [RAI: North Anna – 050]

Evaluation criterion P.8 requires a table of contents and a cross-reference table to the NUREG-0654 evaluation criteria. All plans except the VDH/DRH ERP contain both a Table of Contents and NUREG-0654 Cross Reference table. The NUREG-0654 Cross Reference tables are riddled with errors. Eighty-five of the 109 evaluation criteria were either missing cross-references or were incorrectly cross-referenced. The listing in the Table of Contents for *Attachments* and/or *Appendices* is not consistent with the listings provided at the beginning of each of those sections in the plan for Caroline and Spotsylvania Counties. [RAI: North Anna – 051]

Evaluation criterion P.10, as modified by GM PR-1, *Policy on NUREG-0654/FEMA-REP-1 and 44 CFR 350 Periodic Requirements*, October 1, 1985, requires quarterly updates to telephone numbers, call-down lists, and maps. Only the updating of telephone numbers is addressed in the plans. [RAI: North Anna – 052]

To become fully compliant with the Planning Standard P, information must be provided to address items detailed above.

**APPENDIX 1:
LIST OF ACRONYMS**

Acronym	Definition
C	Caroline County
COL	Combined License
COVRERP	Commonwealth of Virginia Radiological Emergency Response Plan
EAC	Evacuation Assembly Center
EAS	Emergency Alert System
EOC	Emergency Operations Center
EPA	(U.S.) Environmental Protection Agency
EPZ	Emergency Planning Zone
ERP	Emergency Response Plan
H	Hanover County
IPZ	Ingestion Pathway Zone
JIC	Joint Information Center
KI	Potassium Iodide
L	Louisa County
LHD	Local Health Department
MCV	Medical College of Virginia
N/A	Not Applicable
NAPS	North Anna Power Station
NUREG	Nuclear Regulatory Commission Publication
O	Orange County
ORO	Offsite Response Organization
PAD	Protective Action Decision
PAR	Protective Action Recommendation
PAZs	Protective Action Zones
RAI	Request for Additional Information
rem	Roentgen Equivalent Man
RERP	Radiological Emergency Response Plan
S	Spotsylvania County
TEDE	Total Effective Dose Equivalent
VDEM	Virginia Department of Emergency Management
VDH	Virginia Department of Health
VDH/RHP	Virginia Department of Health-Radiological Health Program

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**APPENDIX 2:
NORTH ANNA COL - REQUESTS FOR ADDITIONAL INFORMATION (RAIs)**

RAIs apply as indicated by the following abbreviations to the State and county plans.

States: Virginia (VA), Maryland (MD)

Counties: Louisa (L), Caroline (C), Hanover (H), Orange (O), Spotsylvania (S)

RAI Number	RAI Description	RAI For
North Anna - 001	<p>Subject: Written Agreements Basis: NUREG-0654 Evaluation Criterion A.3 and C.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Volume III, Basic Plan, Attachment 1, <i>Supporting Plans, Memoranda of Understanding, Standing Operating Procedures and Public Affairs Publications</i>, lists two Memoranda of Understanding. Required written agreements (such as those for hospitals, transportation providers, radiological monitoring personnel, etc.) are not incorporated into the plan by reference nor cataloged by title, type of agreement, and government level, including signatories and effective dates. Provide information concerning the written agreements and how they are referenced or incorporated into the plan.</p> <p>B. Louisa County The Louisa County RERP NUREG-0654 Cross Reference indicates that written agreements are published separately. These agreements (such as those for hospitals, transportation providers, radiological monitoring personnel, etc.) are not referenced nor cataloged by title, type of agreement, etc. Provide information concerning the written agreements and how they are referenced or incorporated into the plan.</p> <p>C. Caroline County The Caroline County RERP NUREG-0654 Cross Reference indicates that written agreements are published separately. These agreements (such as those for hospitals, transportation providers, radiological monitoring personnel, etc.) are not referenced nor cataloged by title, type of agreement, etc. Provide information concerning the written agreements and how they are referenced or incorporated into the plan.</p> <p>D. Hanover County The Hanover County RERP NUREG-0654 Cross Reference</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>indicates that written agreements are published separately. These agreements (such as those for hospitals, transportation providers, radiological monitoring personnel, etc.) are not referenced nor cataloged by title, type of agreement, etc. Provide information concerning the written agreements and how they are referenced or incorporated into the plan.</p> <p>E: Orange County The Orange County RERP NUREG-0654 Cross Reference indicates that written agreements are published separately. These agreements (such as those for hospitals, transportation providers, radiological monitoring personnel, etc.) are not referenced nor cataloged by title, type of agreement, etc. Provide information concerning the written agreements and how they are referenced or incorporated into the plan.</p> <p>F. Spotsylvania County The Spotsylvania County RERP NUREG-0654 Cross Reference indicates that written agreements are published separately. These agreements (such as those for hospitals, transportation providers, radiological monitoring personnel, etc.) are not referenced nor cataloged by title, type of agreement, etc. Provide information concerning the written agreements and how they are referenced or incorporated into the plan.</p>	
<p>North Anna – 002</p>	<p>Subject: Capabilities and Availability of Radiological Laboratories Basis: NUREG-0654 Evaluation Criterion C.3 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia A.1 The Commonwealth of Virginia RERP, Appendix 2, Section I.C, <i>Task Assignments, Division of Consolidated Laboratory Services</i>, states that the Consolidated Laboratory Services will provide emergency laboratory services to State agencies and political subdivisions. However, the capabilities and expected availability of the laboratory are not specified. Provide information about the general capabilities and expected availability of the Division of Consolidated Laboratory Services to provide analysis services. A.2 The Commonwealth of Virginia RERP, Annex H, ESF #8, Tab B, <i>Public Health and Medical Services, Radiological Laboratories</i> list secondary laboratories at the Medical College of Virginia and the University of Virginia Medical Center. However, the capabilities and expected availability of the</p>	<p>State: VA</p> <p>County: (None)</p>

RAI Number	RAI Description	RAI For
	<p>secondary laboratories are not specified. Provide information about the general capabilities and expected availability of the secondary laboratories to provide analysis services.</p> <p>A.3 The Virginia Department of Health/Division of Radiological Health ERP, Appendix 5, Section 2.2.3.3, <i>Accident Assessment</i>, states that laboratory services will be provided by their own mobile laboratory or by the Consolidated Laboratory. However, the capabilities and expected availability of the laboratory are not specified. Provide information about the general capabilities and expected availability of the laboratories providing analysis services.</p>	
<p>North Anna – 003</p>	<p>Subject: Procedures for Alerting, Notifying, and Mobilizing Emergency Response Personnel Basis: NUREG-0654 Evaluation Criteria E.2 and F.1.e SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP, Appendix 1, <i>Emergency Management ESF Procedure</i>, and Appendix 5, <i>Emergency Communications ESF Procedure</i>, state that at an Alert declaration or higher, the communications officer is to complete the “Notifications for an ALERT Declaration.” The procedure for mobilizing response personnel is not included in the RERP. Provide information on the procedure to mobilize response personnel.</p> <p>B. Caroline County The Caroline County RERP, Appendix 2, <i>ESF #2 – Communications Procedure</i>, and Appendix 5, <i>ESF #5 – Emergency Management Procedure</i>, state that at an Alert declaration or higher, the communications officer is to complete the “Notifications for an ALERT Declaration.” The procedure for mobilizing response personnel is not included in the RERP. Provide information on the procedure to mobilize response personnel.</p> <p>C. Hanover County The Hanover County RERP, Appendix 2, <i>ESF #2 – Communications Procedure</i>, and Appendix 5, <i>ESF #5 – Emergency Management Procedure</i>, state that at an Alert declaration or higher, the communications officer is to complete the “Notifications for an ALERT Declaration.” The procedure for mobilizing response personnel is not included in the RERP. Provide information on the procedure to mobilize response personnel.</p>	<p>State: (None)</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>D. Orange County The Orange County RERP, Appendix 1, <i>Emergency Management ESF Procedure</i>, and Appendix 5, <i>Emergency Communications ESF Procedure</i>, state that at an Alert declaration or higher, the communications officer is to complete the "Notifications for an ALERT Declaration." The procedure for mobilizing response personnel is not included in the RERP. Provide information on the procedure to mobilize response personnel.</p> <p>E. Spotsylvania County The Spotsylvania County RERP, Appendix 2, <i>ESF #2 – Communications Procedure</i>, and Appendix 5, <i>ESF #5 – Emergency Management Procedure</i>, state that at an Alert declaration or higher, the communications officer is to complete the "Notifications for an ALERT Declaration." The procedure for mobilizing response personnel is not included in the RERP. Provide information on the procedure to mobilize response personnel.</p>	
<p>North Anna – 004</p>	<p>Subject: Identification of, Notification of, and Information Dissemination to Special Populations Basis: NUREG-0654 Evaluation Criterion E.5 and J.10.c SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County</p> <p>A.1 The Louisa County RERP, Appendix 8, <i>Public Health ESF Procedure</i>, does not include procedures on the identification (for reasons other than for pre-distribution of potassium iodide) of special needs populations who are not institutionalized. Section VII.A.5, <i>Organization, Department of Mental Health and Mental Retardation</i>, states that the department will maintain a list of mentally handicapped persons who would require assistance during a radiological emergency; however, the methods used to develop this list are not described. Provide information on the identification of the special needs populations.</p> <p>A.2 The Louisa County RERP, Section VII.A.4, <i>Organization, Department of Social Services</i>, states that the department will assist in managing the emergency needs of special needs individuals. Section VII.A.5, <i>Organization, Department of Mental Health and Mental Retardation</i>, states that the department will maintain a list of mentally handicapped persons who would require assistance during a radiological emergency. The procedure for notifying this population during an emergency is not included in the RERP. Provide</p>	<p>State: (None)</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>information on the procedure to notify and provide information to the special needs population.</p> <p>B. Caroline County</p> <p>B.1 The Caroline County RERP, Appendix 8, <i>ESF #8 – Public Health Procedure</i>, does not include procedures on the identification (for reasons other than for pre-distribution of potassium iodide) of special needs populations who are not institutionalized. Provide information on the identification of the special needs populations.</p> <p>B.2 The Caroline County RERP, Section VII.A.4, <i>Organization, Department of Social Services</i>, states that the department will assist in the notification and evacuation of any known special needs individuals residing within the 10-mile EPZ. Appendix 8, <i>ESF #8 – Public Health Procedure</i> states that the Department of Public Health will assist the Department of Community Services. The procedure for notifying this population during an emergency is not included in the RERP. Provide information on the procedure to notify and provide information to the special needs population.</p> <p>C. Hanover County</p> <p>C.1 The Hanover County RERP, Appendix 8, <i>ESF #8 – Public Health Procedure</i>, does not include procedures on the identification (for reasons other than for pre-distribution of potassium iodide) of special needs populations who are not institutionalized. Provide information on the identification of the special needs populations.</p> <p>C.2 The Hanover County RERP, Section VII.A.4, <i>Organization, Department of Social Services</i>, states that the department will assist in the notification and evacuation of any known special needs individuals residing within the 10-mile EPZ. Appendix 8, <i>ESF #8 – Public Health Procedure</i> states that the Department of Public Health will assist the Department of Community Services. The procedure for notifying this population during an emergency is not included in the RERP. Provide information on the procedure to notify and provide information to the special needs population.</p> <p>D. Orange County</p> <p>D.1 The Orange County RERP, Appendix 8, <i>Public Health ESF Procedure</i>, does not include procedures on the identification (for reasons other than for pre-distribution of potassium iodide) of special needs populations who are not institutionalized.</p>	

RAI Number	RAI Description	RAI For
	<p>Provide information on the identification of the special needs populations.</p> <p>D.2 The Orange County RERP, Section VII.A.5, <i>Organization, Department of Public Health</i>, states that the Department of Public Health will coordinate and assist with needs of special needs population residing within the 10-mile EPZ. The procedure for notifying this population during an emergency is not included in the RERP. Provide information on the procedure to notify and provide information to the special needs population.</p> <p>E. Spotsylvania County—</p> <p>E.1 The Spotsylvania County RERP, Appendix 8, <i>ESF #8 – Public Health Procedure</i>, does not include procedures on the identification (for reasons other than for pre-distribution of potassium iodide) of special needs populations who are not institutionalized. Section VII.A.5, <i>Department of Mental Health and Mental Retardation</i>, states that the department will maintain a list of mentally handicapped persons who would require assistance during a radiological emergency; however, the methods used to develop this list are not described. Provide information on the identification of the special needs populations.</p> <p>E.2 The Spotsylvania County RERP, Section VII.A.4, <i>Organization, Department of Social Services</i>, states that the department will identify and manage special needs individuals residing within the 10-mile EPZ. Section VII.A.5, <i>Department of Mental Health and Mental Retardation</i>, states that the department will maintain a list of mentally handicapped persons who would require assistance during a radiological emergency. Appendix 8, <i>ESF #8 – Public Health Procedure</i> states that the Department of Public Health will assist the Department of Community Services. The procedure for notifying this population during an emergency is not included in the RERP. Provide information on the procedure to notify and provide information to the special needs population.</p>	
<p>North Anna – 005</p>	<p>Subject: Administrative and Physical Means for Notifying and Providing Information to the Public Basis: NUREG-0654 Evaluation Criterion E.6 and J.10.c SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP, Section VIII.D, <i>Concept of Operations</i>,</p>	<p>State: (None)</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p><i>Alerting</i>, states that back-up route alerting will be performed if all or part of the siren system fails to function. Appendix 1, <i>Emergency Management ESF Procedure</i>, states that the sheriff's department is to perform route alerting in failed sirens areas and references the "North Anna Siren Manual." Appendix 4, <i>Law Enforcement ESF Procedure</i>, includes information for route alerting for areas not covered by sirens; however, it does not including information for routes corresponding to failed sirens nor does it reference the appropriate information. Provide information on the routes corresponding to the sirens should the siren system fail.</p> <p>B. Caroline County The Caroline County RERP, Section VIII.D, <i>Concept of Operations, Alerting</i>, states that back-up route alerting will be performed if all or part of the siren system fails to function. Appendix 5, <i>ESF #5 – Emergency Management Procedure</i>, states that the sheriff's department is to perform route alerting in failed sirens areas. Appendix 13, <i>ESF #13 – Public Safety and Security Procedure</i>, includes information for route alerting for areas not covered by sirens; however, it does not including information for routes corresponding to failed sirens but does reference the "North Anna Siren Coverage Manual." Provide information on the routes corresponding to the sirens should the siren system fail.</p> <p>C. Hanover County The Hanover County RERP, Section VIII.D, <i>Concept of Operations, Alerting</i>, states that back-up route alerting will be performed if all or part of the siren system fails to function. Appendix 5, <i>ESF #5 – Emergency Management Procedure</i>, states that the sheriff's department is to perform route alerting in failed sirens areas. Appendix 13, <i>ESF #13 – Public Safety and Security Procedure</i>, includes information for route alerting for areas not covered by sirens; however, it does not including information for routes corresponding to failed sirens but does reference the "Back-up Route Alerting and Siren Manual." Provide information on the routes corresponding to the sirens should the siren system fail.</p> <p>D. Orange County The Orange County RERP, Section VIII.D, <i>Concept of Operations, Alerting</i>, states that back-up route alerting will be performed if all or part of the siren system fails to function. No other mention of back-up route alerting is found in the Orange County RERP. Provide information on the back-up route alerting in Orange County including the routes corresponding to the sirens should the siren</p>	

RAI Number	RAI Description	RAI For
	<p>system fail.</p> <p>E. Spotsylvania County The Spotsylvania County RERP, Section VIII.D, Concept of Operations, Alerting, states that back-up route alerting will be performed if all or part of the siren system fails to function. Appendix 5, <i>ESF #5 – Emergency Management Procedure</i>, states that the sheriff’s department is to perform route alerting in failed sirens areas and references the “North Anna Siren Manual.” Appendix 13, <i>ESF #13 – Public Safety and Security Procedure</i>, includes information for route alerting for areas not covered by sirens; however, it does not including information for routes corresponding to failed sirens but does reference the “North Anna Siren Manual.” Provide information on the routes corresponding to the sirens should the siren system fail.</p>	
<p>North Anna – 006</p>	<p>Subject: Messages for the Public Concerning the Use of Potassium Iodide (KI) Basis: NUREG-0654 Evaluation Criterion E.7 and J.10.c SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A.- Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 8, <i>Potassium Iodide (KI) Administration</i>, states that protective action decisions regarding KI will be transmitted to the local government Emergency Operations Centers and broadcast to the general public using the Emergency Alert System (EAS). It further states that VDEM will coordinate news releases with VDH about KI and that the PIO will issue news releases regarding the use of KI. None of the pre-scripted messages (either EAS or news releases) found in Annex M, Public Information, address the use of or distribution of KI. The County RERPs do contain sample news releases with this information. Provide pre-scripted messages (both EAS and news releases) in the COVRERP about the use of and distribution of KI.</p>	<p>State: VA</p> <p>County: (None)</p>
<p>North Anna – 007</p>	<p>Subject: Coordinated Communication Link for Fixed and Mobile Medical Support Facilities Basis: NUREG-0654 Evaluation Criterion F.2 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 10, <i>Communications</i>, provides information on the communications links between ambulances, hospitals, mobile command vehicles, and the</p>	<p>State: VA</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>Emergency Operations Center (EOC); however, it states that “direct communications from the North Anna Station to the University of Virginia Hospital ... are possible...” However, the University of Virginia Hospital (UVA) is not listed as a primary or back hospital for North Anna, and no information is provided for communications with the Medical College of Virginia (MCV) (primary hospital) or the Mary Washington Hospital (back-up hospital). Also in Appendix 10, it states that radio contact is possible between the Louisa County Sheriff’s Department to UVA in Charlottesville and that the Virginia EOC can directly contact UVA and MCV via radio. Provide information on the communications links between the Virginia EOC and the fixed and mobile medical support facilities and between the County EOCs and those same facilities.</p> <p>B. Louisa County The Louisa County RERP does not directly address communications with fixed and mobile medical support facilities. Provide information on the communications systems between the Louisa County EOC and the fixed and mobile medical support facilities.</p> <p>C. Caroline County The Caroline County RERP does not directly address communications with fixed and mobile medical support facilities. Provide information on the communications systems between the Caroline County EOC and the fixed and mobile medical support facilities.</p> <p>D. Hanover County The Hanover County RERP does not directly address communications with fixed and mobile medical support facilities. Provide information on the communications systems between the Hanover County EOC and the fixed and mobile medical support facilities.</p> <p>E. Orange County The Orange County RERP does not directly address communications with fixed and mobile medical support facilities. Provide information on the communications systems between the Orange County EOC and the fixed and mobile medical support facilities.</p> <p>F. Spotsylvania County The Spotsylvania County RERP does not directly address communications with fixed and mobile medical support facilities.</p>	

RAI Number	RAI Description	RAI For
	Provide information on the communications systems between the Spotsylvania County EOC and the fixed and mobile medical support facilities. -	
North Anna - 008	<p>Subject: Coordinated Periodic Dissemination of Public Information Basis: NUREG-0654 Evaluation Criterion G.1 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia A.1. The Commonwealth of Virginia RERP, Appendix 9, Section II.A.1, <i>Public Information, Non-Emergency Periods</i>, states that the public information will be provided annually and will include the information delineated in NUREG criterion G.1, but the information was not provided for review. This same statement is made in all of the risk county plans in Section IX.C.1, <i>Direction and Control, Public Information, Non-Emergency Periods</i>; it also states that the counties may participate with Dominion and the Virginia Department of Emergency Management in this annual distribution. Provide the public information materials that are distributed annually. A.2. The RERP does not include information on ensuring that special population groups receive appropriate information on radiation, contact for additional information, protective measures, and special needs. Provide the appropriate public information materials.</p>	<p>State: VA</p> <p>County: (None)</p>
North Anna - 009	<p>Subject: Signs or Other Measures Used to Disseminate Information to Transient Populations Basis: NUREG-0654 Evaluation Criterion G.2 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 9, Section II.A.1, <i>Public Information, Non-Emergency Periods</i>, states that the public information will be available to transients by way of yellow pages advertisements and that one way of distributing the information is by posting in public areas. A similar statement is made in all of the risk county plans in Section IX.C.1, <i>Direction and Control, Public Information, Non-Emergency Periods</i>. Where the information is posted or available telling transients how to find the appropriate information was not submitted for review. Provide the means of informing transient populations of where to find the necessary emergency information.</p>	<p>State: VA</p> <p>County: (None)</p>

RAI Number	RAI Description	RAI For
<p>North Anna – 010</p>	<p>Subject: Coordinated Program to Familiarize News Media with Emergency Plans, Information Concerning Radiation, and Points of Contact Basis: NUREG-0654 Evaluation Criterion G.5 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP does not reference an annual media briefing to familiarize the news media with emergency plans, information concerning radiation, and points of contact. However, the County RERPs state in Section IX.C.1, <i>Direction and Control, Public Information, Non-Emergency Periods</i>, that they will participate, in conjunction with the utility and the State, in an annual briefing of the local news media. Provide information about the Commonwealth’s participation in the annual briefing of the news media and the information that will be presented to the news media.</p>	<p>State: VA</p> <p>County: (None)</p>
<p>North Anna – 011</p>	<p>Subject: Notification and Activation of Evacuation Assembly Centers Personnel Basis: NUREG-0654 Evaluation Criterion H.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP, Appendix 1, <i>Emergency Management ESF Procedures</i>, states that upon opening an Evacuation Assembly Center (EAC), the EOC is to notify all appropriate persons and organizations. Appendix 3, <i>Mass Care ESF Procedures</i>, says that the EAC Supervisor is to notify EAC staff. The notification procedures are not specified, nor are the staffing organizations for the required positions. Provide notification and activation information for the EACs.</p> <p>B. Caroline County The Caroline County RERP, Appendix 5, <i>ESF #5 – Emergency Management Procedure</i>, states that upon opening an Evacuation Assembly Center (EAC), the EOC is to notify all appropriate persons and organizations. Appendix 6, Tab B, <i>Evacuation Assembly Center Operational Procedure</i>, lists the organizations that staff the EAC. The notification procedures are not specified. Provide notification and activation information for the EACs.</p> <p>C. Hanover County The Hanover County RERP, Appendix 5, <i>ESF #5 – Emergency Management Procedure</i>, states that upon opening an Evacuation</p>	<p>State: (None)</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>Assembly Center (EAC), the EOC is to notify all appropriate persons and organizations. Appendix 6, Tab B, <i>Evacuation Assembly Center Operational Procedure</i>, lists the organizations that staff the EAC. The notification procedures are not specified. Provide notification and activation information for the EAC.</p> <p>D. Orange County The Orange County RERP; Appendix 3, <i>Mass Care ESF Procedure</i>, does not specify who contacts the Evacuation Assembly Center (EAC) staff. The notification procedures are not specified, but the organizations staffing the EAC are listed. Provide notification and activation information for the EACs.</p> <p>E. Spotsylvania County The Spotsylvania County RERP, Appendix 6, <i>ESF #6 – Mass Care Procedure</i>, does not specify who contacts the Evacuation Assembly Center (EAC) staff although it does state that the Department of Social Services is to ensure they have been contacted. The notification procedures are not specified, nor are the organizations staffing the EAC. Provide notification and activation information for the EACs.</p>	
<p>North Anna – 012</p>	<p>Subject: Provisions to Inspect, Inventory, and Operationally Check Emergency Equipment/Instruments Basis: NUREG-0654 Evaluation Criterion H.10 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 7, Section III.A, <i>Radiological Exposure Control, Logistics, Equipment</i>, states that State agencies and local governments will inventory and operationally inspect their equipment quarterly as well as prior to and after each use. There is not a corresponding procedure to complete this inventory and operational check. Provide information on the quarterly inventory and operational checks of equipment.</p> <p>B. Louisa County The Louisa County RERP, Section VII.A.1.f(5), <i>Organization, Louisa County, Department of Emergency Services</i>, states that the department is in charge of equipment inventory and maintenance. There is not a procedure for quarterly inventory and operational checks. Provide information on the quarterly inventory and operational checks of equipment.</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>C. Caroline County The Caroline County RERP, Section VII.A.1.h(5), <i>Organization, Caroline County, Department of Fire and Rescue/Emergency Services</i>, states that the department is to maintain equipment inventory and upkeep. There is not a procedure for quarterly inventory and operational checks. Provide information on the quarterly inventory and operational checks of equipment.</p> <p>D. Hanover County The Hanover County RERP, Section VII.A.1.h(5), <i>Organization, Hanover County, Department of Emergency Services</i>, states that the department is to maintain equipment inventory and upkeep. There is not a procedure for quarterly inventory and operational checks. Provide information on the quarterly inventory and operational checks of equipment.</p> <p>E. Orange County The Orange County RERP, Section VII.A.1.f(4), <i>Organization, Orange County, Department of Emergency Management</i>, states that the department is in charge of equipment inventory and maintenance. There is not a procedure for quarterly inventory and operational checks. Provide information on the quarterly inventory and operational checks of equipment.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Section VII.A.1.f(4), <i>Organization, Spotsylvania County, Office of Emergency Services</i>, states that the office is in charge of equipment inventory and maintenance. There is not a procedure for quarterly inventory and operational checks. Provide information on the quarterly inventory and operational checks of equipment.</p>	
<p>North Anna – 013</p>	<p>Subject: Emergency Kit Information Basis: NUREG-0654 Evaluation Criterion H.11 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 7, Tab E, <i>Radiological Exposure Control, Radiological Monitoring Equipment Issued to Local Governments</i>, lists the quantities of thermo luminescent dosimeters, self-reading dosimeters, survey meters, and portal monitors in each local jurisdiction. There is no information about protective equipment, communications equipment, or emergency supplies. Provide information on</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>emergency equipment.</p> <p>B. Louisa County The Louisa County RERP references Appendix 6, Attachment 1, <i>Hazardous Materials Procedure, Equipment Distribution Log</i> (blank) which allows entries for dosimetry issuance; Appendix 7, Section II, <i>Search and Rescue ESF Procedure, Discussion/Overview</i> which has no information about any kind of equipment; and Appendix 8, Attachment 2, <i>Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones</i>. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.</p> <p>C. Caroline County The Caroline County RERP references Appendix 6, Attachment 1, <i>ESF #6 – Mass Care Procedure</i>, there are two Attachment 1’s – neither have equipment information. Attachment 2 to the Evacuation Assembly Center (EAC) procedure (Tab B of Appendix 6) does have an equipment listing, but it is specifically for the EAC. Appendix 7, Section II, <i>ESF #7 – Resource Support Procedure</i> does not have a section II and references the “Logistics Support Annex” which was not provided for review. Appendix 8, Attachment 2, <i>ESF #8 – Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones</i>. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.</p> <p>D. Hanover County The Hanover County RERP references Appendix 6, Attachment 1, <i>ESF #6 – Mass Care Procedure</i>, there are two Attachment 1’s – neither have equipment information. Attachment 2 to the Evacuation Assembly Center (EAC) procedure (Tab B of Appendix 6) does have an equipment listing, but it is specifically for the EAC. Appendix 7, Section II, <i>ESF #7 – Resource Support Procedure</i> does not have a section II and references the “Logistics Support Annex” which was not provided for review. Appendix 8, Attachment 2, <i>ESF #8 – Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones</i>. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.</p>	

RAI Number	RAI Description	RAI For
	<p>E. Orange County The Orange County RERP references Appendix 6, Attachment 1, <i>Hazardous Materials Procedure, Equipment Distribution Log</i> (blank) which allows entries for dosimetry issuance; Appendix 7, Section II, <i>Search and Rescue ESF Procedure, Discussion/Overview</i> which has no information about any kind of equipment; and Appendix 8, Attachment 2, <i>Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones</i>. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.</p> <p>F. Spotsylvania County The Spotsylvania County RERP references Appendix 6, Attachment 1, <i>ESF #6 – Mass Care Procedure</i>, there are two Attachment 1's – neither have equipment information. Attachment 2 to the Evacuation Assembly Center (EAC) procedure (Tab B of Appendix 6) does have an equipment listing, but it is specifically for the EAC. Appendix 7, Section II, <i>ESF #7 – Resource Support Procedure</i> does not have a section II and references the “Logistics Support Annex” which was not provided for review. Appendix 8, Attachment 2, <i>ESF #8 – Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones</i>. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.</p>	
<p>North Anna – 014</p>	<p>Subject: Field Monitoring Team Procedures Basis: NUREG-0654 Evaluation Criterion I.8 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Virginia Department of Health/Division of Radiological ERP, Appendix 1, <i>Task Assignments</i>, states that the Department of Health will be responsible for providing Radiological Monitoring Teams and furnishing applicable supplies and equipment. Specific field monitoring procedures for the State were not provided for review. Provide specific field monitoring procedures, including activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.</p>	<p>State: VA</p> <p>County: (None)</p>

RAI Number	RAI Description	RAI For
<p>North Anna – 015</p>	<p>Subject: Air Sampling Procedures Basis: NUREG-0654 Evaluation Criterion I.9 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 6, <i>Accident Assessment</i>, and Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 5, <i>Accident Assessment</i>, indicate that the VDH/DRH field monitoring teams have the capability to detect radioiodine in the presence of noble gas at levels of 10^{-7} uCi/cc through the use of air samplers with silver zeolite cartridges. No specific procedures were provided from the state for the process of collecting air samples, location of sampling points, and techniques to collect and count air samples. Provide specific field monitoring procedures for air sampling that ensure the capability to detect radioiodine at the required level.</p>	<p>State: VA</p> <p>County: (None)</p>
<p>North Anna – 016</p>	<p>Subject: Dose Assessment Basis: NUREG-0654 Evaluation Criterion I.10 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 5, <i>Accident Assessment</i>, states that the estimation of integrated dose from the projected and actual dose rates and comparisons with EPA PAGs will be performed at the Emergency Operations Facility by VDH/DRH personnel. No procedures for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides were provided for review. Provide procedures for dose assessment and EPA PAG comparisons.</p>	<p>State: VA</p> <p>County: (None)</p>
<p>North Anna – 017</p>	<p>Subject: Onsite Personnel Evacuation Assistance Basis: NUREG-0654 Evaluation Criterion J.2 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia A.1 The Commonwealth of Virginia RERP, Appendix 5 <i>Emergency Response</i>, describes the planning for the emergency response, including evacuation plans and time estimates for the 10-mile emergency planning zone. The assistance that will be provided to North Anna Power Station (NAPS) during an evacuation and the provisions for coordinating arrangements with the offsite organizations to expedite the evacuation of onsite personnel are</p>	<p>State: VA</p> <p>County: L/S</p>

RAI Number	RAI Description	RAI For
	<p>not included in the plans. Provide information on the assistance that will be provided to NAPS during an onsite evacuation.</p> <p>A.2 The remote assembly centers for onsite personnel during an evacuation of the North Anna site are not identified in the offsite plans. Provide information identifying the remote assembly centers.</p> <p>B. Louisa County</p> <p>B.1 The Louisa County RERP, NUREG-0654 Cross Reference indicates that this criterion is “not applicable.” However, according to the COL Application, Figure II-4, <i>Routes to Assembly Areas</i>, the primary remote assembly area is located near Mineral, Virginia, in Louisa County. The secondary remote assembly area is located at North Anna Dam (located in Spotsylvania County) with travel through Louisa County before crossing into Spotsylvania County. The assistance that will be provided to North Anna Power Station (NAPS) during an evacuation and the provisions for coordinating arrangements with the offsite organizations to expedite the evacuation of onsite personnel are not included in the plans. Provide information on the assistance that will be provided to NAPS during an onsite evacuation.</p> <p>B.2 The remote assembly centers for onsite personnel during an evacuation of the North Anna site are not identified in the offsite plans. Provide information identifying the remote assembly centers.</p> <p>C. Spotsylvania County</p> <p>C.1 The Spotsylvania County RERP, NUREG-0654 Cross Reference indicates that this criterion is “not applicable.” However, according to the COL Application, Figure II-4, <i>Routes to Assembly Areas</i>, the secondary remote assembly area is located at North Anna Dam (located in Spotsylvania County). The assistance that will be provided to North Anna Power Station (NAPS) during an evacuation and the provisions for coordinating arrangements with the offsite organizations to expedite the evacuation of onsite personnel are not included in the plans. Provide information on the assistance that will be provided to NAPS during an onsite evacuation.</p> <p>C.2 The remote assembly centers for onsite personnel during an evacuation of the North Anna site are not identified in the offsite plans. Provide information identifying the remote assembly centers.</p>	

RAI Number	RAI Description	RAI For
North Anna – 018	<p>Subject: Protective Action Basis and Capability to Implement Basis: NUREG-0654 Evaluation Criterion J.9 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia</p> <p>A.1 The Commonwealth of Virginia RERP, Section VII, <i>Organization</i>, states that the Virginia Department of Emergency Management coordinates the overall response and that the Virginia Department of Health, through the Radiological Health Program, provides technical advice and assistance on exposure control. The plans do not contain predetermined public Protective Action Decisions (PADs) based on plant conditions. Provide information on predetermined PADs based on plant conditions.</p> <p>A.2 Appendix 7, Tab A, <i>Radiological Exposure Control, Protective Action Guides for the General Population</i>, sets Protective Action Guidelines for protecting the general public during the emergency phase, but does not address protective action guidelines for the ingestion pathway phase and does not include the FDA Derived Intervention Levels. The plans are unclear as to who, by title, will make PADs for the ingestion pathway and who will implement the protective actions once those decisions have been made and communicated to the affected local governments and subdivisions. Provide ingestion pathway decision-making information including the title of the person making decisions and what organization will implement those decisions.</p> <p>A.3 COVRERP, Attachment 1, <i>Supporting Plans, Memoranda of Understanding, Standing Operating Procedures, and Public Affairs Publications</i>, lists local government ingestion pathway RERP plans as supporting plans and directs the reader to Appendix 3, Tab E. There is no Appendix 3, Tab E. Provide information for the local government ingestion pathway RERP plans.</p> <p>A.4 The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Section 8.1.5, <i>Concept of Operations and Procedures</i>, states that VDH/DRH will coordinate protective actions within the ingestion pathway in cooperation with the Department of Agriculture and Consumer Services and the State Water Control Board. VDR/DHR ERP Appendix 17, <i>Standing Operating Procedures</i>, lists SOPs for post-plume dose projection procedures and post-plume pathway package. However, these references were not available for review. The plan does not identify the protective</p>	<p>State: VA/MD</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>actions or concentrations levels that will be used in decision-making for the ingestion phase. Provide information on the protective actions for the ingestion pathway and the radiation dose or concentration levels that will be used in decision-making.</p> <p>B. Louisa County</p> <p>B.1 The Louisa County RERP Section VIII.F, <i>Exposure Limits</i>, lists protective actions based on the EPA PAG Manual; however, it does not list possible precautionary protective actions for prevention of ingestion exposure. Provide information on protective action guidelines for the ingestion pathway.</p> <p>B.2 The Louisa County RERP, Appendix 2, <i>Emergency Public Information ESF Procedure</i>, states that, at the SAE, the PIO is to consult with the Coordinator to determine if there has been a recommendation to shelter livestock. If a recommendation has been made, issue news release to alert the public to these recommendations. There is no process at the General Emergency to update and expand protective actions to farmers and producers. Provide information as to what criteria is necessary to notify agricultural establishments to take further preventive protective measures.</p> <p>C. Caroline County</p> <p>C.1 The Caroline County RERP, Section VIII.F, <i>Exposure Limits</i>, lists protective actions based on the EPA PAG Manual; however, it does not list possible precautionary protective actions for prevention of ingestion exposure. Provide information on protective action guidelines for the ingestion pathway.</p> <p>C.2 The Caroline County RERP, Appendix 15, <i>ESF #15 External Affairs Procedure</i>, states that, at the SAE, the PIO is to consult with the Coordinator to determine if there has been a recommendation to shelter livestock. If a recommendation has been made, issue news release to alert the public to these recommendations. There is no process at the General Emergency to update and expand protective actions to farmers and producers. Provide information as to what criteria is necessary to notify agricultural establishments to take further preventive protective measures.</p> <p>D. Hanover County</p> <p>D.1 The Hanover County RERP, Section VIII.F, <i>Exposure Limits</i>,</p>	

RAI Number	RAI Description	RAI For
	<p>lists protective actions based on the EPA PAG Manual; however, it does not list possible precautionary protective actions for prevention of ingestion exposure. Provide information on protective action guidelines for the ingestion pathway.</p> <p>D.2 The Hanover County RERP, Appendix 15, <i>ESF #15 External Affairs Procedure</i>, states that, at the SAE, the PIO is to consult with the Coordinator to determine if there has been a recommendation to shelter livestock. If a recommendation has been made, issue news release to alert the public to these recommendations. There is no process at the General Emergency to update and expand protective actions to farmers and producers. Provide information as to what criteria is necessary to notify agricultural establishments to take further preventive protective measures.</p> <p>E. Orange County</p> <p>E.1 The Orange County RERP, Section VIII.F, <i>Exposure Limits</i>, lists protective actions based on the EPA PAG Manual; however, it does not list possible precautionary protective actions for prevention of ingestion exposure. Provide information on protective action guidelines for the ingestion pathway.</p> <p>E.2 The Orange County RERP, Appendix 2, <i>Emergency Public Information ESF Procedure</i>, states that, at the SAE consult with the Coordinator to determine if there has been a recommendation to shelter livestock. If a recommendation has been made, issue news release to alert the public to these recommendations. There is no process at the General Emergency to update and expand protective actions to farmers and producers. Provide information as to what criteria is necessary to notify agricultural establishments to take further preventive protective measures.</p> <p>F. Spotsylvania County</p> <p>F.1 The Spotsylvania County RERP, Section VIII.F, <i>Exposure Limits</i>, lists protective actions based on the EPA PAG Manual; however, it does not list possible precautionary protective actions for prevention of ingestion exposure. Provide information on protective action guidelines for the ingestion pathway.</p> <p>F.2 The Spotsylvania County RERP, Appendix 15, <i>ESF #15 External Affairs Procedure</i>, states that, at the SAE, the PIO is to consult with the Coordinator to determine if there has been a</p>	

RAI Number	RAI Description	RAI For
	<p>recommendation to shelter livestock. If a recommendation has been made, issue news release to alert the public to these recommendations. There is no process at the General Emergency to update and expand protective actions to farmers and producers. Provide information as to what criteria is necessary to notify agricultural establishments to take further preventive protective measures.</p> <p>G. The State of Maryland RERP was not provided for review. The 50-mile ingestion pathway planning zones extends into Maryland. Provide the State of Maryland RERP.</p>	
<p>North Anna – 019</p>	<p>Subject: Maps Displaying Information to Support Evacuation Planning Basis: NUREG-0654 Evaluation Criterion J.10.a SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. The Commonwealth of Virginia A.1 The Commonwealth of Virginia RERP, Appendix 5, <i>Emergency Response</i>, provides a map showing “Protective Action Zones” (PAZs) around North Anna Power Station. However, the RERP does not include maps showing pre-selected radiological sampling and monitoring points (including points for sampling water supplies), or the locations of Evacuation Assembly Centers. Provide maps showing pre-selected radiological sampling and monitoring points (including points for sampling water supplies), and the locations of Evacuation Assembly Centers. A.2 The maps of evacuation routes and PAZs do not clearly identify evacuation direction, roads, towns, or special facilities (such as schools). Provide information that clearly identifies evacuation direction, roads, towns, and special facilities on maps.</p> <p>B. Louisa County B.1 The Louisa County RERP, Appendix 3, <i>Mass Care ESF Procedure</i>, does not have the road names and other details in the emergency public bus route maps large enough to be legible. Provide emergency public bus route maps with road names and other details that are large enough to be legible. B.2 The Louisa County RERP does not include maps specifying the locations of Evacuation Assembly Centers and does not clearly identify towns or special facilities. Provide maps specifying the locations of Evacuation Assembly Centers and clearly</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>identifying towns and special facilities.</p> <p>C. Caroline County The Caroline County RERP does not include maps specifying the locations of Evacuation Assembly Centers and does not clearly identify towns or special facilities. Provide maps specifying the locations of Evacuation Assembly Centers and clearly identifying towns and special facilities.</p> <p>D. Hanover County The Hanover County RERP does not include maps specifying the locations of Evacuation Assembly Centers and does not clearly identify towns or special facilities. Provide maps specifying the locations of Evacuation Assembly Centers and clearly identifying towns and special facilities.</p> <p>E. Orange County The Orange County RERP does not include maps specifying the locations of Evacuation Assembly Centers and does not clearly identify towns or special facilities. Provide maps specifying the locations of Evacuation Assembly Centers and clearly identifying towns and special facilities.</p> <p>F. Spotsylvania County The Spotsylvania County RERP does not include maps specifying the locations of Evacuation Assembly Centers and does not clearly identify towns or special facilities. Provide maps specifying the locations of Evacuation Assembly Centers and clearly identifying towns and special facilities.</p>	
<p>North Anna – 020</p>	<p>Subject: Population Distribution Maps Basis: NUREG-0654 Evaluation Criterion J.10.b SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia A.1 The Commonwealth of Virginia RERP, Appendix 5, Tab B, Attachment 4, <i>Emergency Response, Population at Risk and Protective Actions, NAPS Protective Action Zones and Routes</i>, is a legible map that shows the protective action zones (PAZs) surrounding the North Anna Power Station (NAPS); however, the routes are not clearly marked. This map is supplemented by data tables in Attachment 6, 2000 Census Population within 10-mile EPZ of NAPS, which show the permanent resident population distribution within the NAPS 10-mile EPZ,</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>organized by PAZ. There is also a table that details the public school populations within the NAPS 10 mile EPZ, organized by PAZ. However, information about the locations and populations of private schools or day-care centers or other special facilities within the 10-mile EPZ is not provided. Provide information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ.</p> <p>A.2 Information about the locations of recreation areas within the 10-mile EPZ and the maximum anticipated populations of these recreation areas is not included in the RERP. Provide information identifying the locations of recreation areas within the 10-mile EPZ with associated information on the maximum anticipated populations.</p> <p>B. Louisa County RERP</p> <p>B.1 The Louisa County RERP, Attachment 3, <i>Protective Action Zones Map North Anna Power Station</i>, is a legible map that shows the protective action zones (PAZs) surrounding the North Anna Power Station (NAPS). This map is supplemented by data tables in Attachment 6 which show the permanent resident population distribution within the NAPS 10-mile EPZ, organized by PAZ. There is also a table that details the public school populations within the NAPS 10 mile EPZ, organized by PAZ. However, information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Louisa County is not provided. Provide information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Louisa County.</p> <p>B.2 Information about the locations of recreation areas within the 10-mile EPZ and the maximum anticipated populations of these recreation areas is not included in the RERP. Provide information identifying the locations of recreation areas within the 10-mile EPZ in Louisa County with associated information on the maximum anticipated populations.</p> <p>C. Caroline County</p> <p>C.1 The Caroline County RERP, Attachment 3, <i>Protective Action Zones Map North Anna Power Station</i>, is a legible map that shows the protective action zones (PAZs) surrounding the North Anna Power Station (NAPS). This map is supplemented by data tables in Attachment 6 which show the permanent resident population distribution within the NAPS 10-mile EPZ,</p>	

RAI Number	RAI Description	RAI For
	<p>organized by PAZ. There is also a table that details the public school populations within the NAPS 10 mile EPZ, organized by PAZ. However, information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Caroline County is not provided. Provide information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Caroline County.</p> <p>C.2 Information about the locations of recreation areas within the 10-mile EPZ and the maximum anticipated populations of these recreation areas is not included in the RERP. Provide information identifying the locations of recreation areas within the 10-mile EPZ in Caroline County with associated information on the maximum anticipated populations.</p> <p>D. Hanover County</p> <p>D.1 The Hanover County RERP, Attachment 3, <i>Protective Action Zones Map North Anna Power Station</i>, is a legible map that shows the protective action zones (PAZs) surrounding the North Anna Power Station (NAPS). This map is supplemented by data tables in Attachment 6 which show the permanent resident population distribution within the NAPS 10-mile EPZ, organized by PAZ. There is also a table that details the public school populations within the NAPS 10 mile EPZ, organized by PAZ. However, information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Hanover County is not provided. Provide information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Hanover County.</p> <p>D.2 Information about the locations of recreation areas within the 10-mile EPZ and the maximum anticipated populations of these recreation areas is not included in the RERP. Provide information identifying the locations of recreation areas within the 10-mile EPZ in Hanover County with associated information on the maximum anticipated populations.</p> <p>E. Orange County</p> <p>E.1 The Orange County RERP, Attachment 3, <i>Protective Action Zones Map North Anna Power Station</i>, is a legible map that shows the protective action zones (PAZs) surrounding the North Anna Power Station (NAPS). This map is supplemented by data tables in Attachment 6 which show the permanent resident population distribution within the NAPS 10-mile EPZ,</p>	

RAI Number	RAI Description	RAI For
	<p>organized by PAZ. There is also a table that details the public school populations within the NAPS 10 mile EPZ, organized by PAZ. However, information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Orange County is not provided. Provide information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Orange County.</p> <p>E.2 Information about the locations of recreation areas within the 10-mile EPZ and the maximum anticipated populations of these recreation areas is not included in the RERP. Provide information identifying the locations of recreation areas within the 10-mile EPZ in Orange County with associated information on the maximum anticipated populations.</p> <p>F. Spotsylvania County</p> <p>F.1 The Spotsylvania County RERP, Attachment 3, <i>Protective Action Zones Map North Anna Power Station</i>, is a legible map that shows the protective action zones (PAZs) surrounding the North Anna Power Station (NAPS). This map is supplemented by data tables in Attachment 6 which show the permanent resident population distribution within the NAPS 10-mile EPZ, organized by PAZ. There is also a table that details the public school populations within the NAPS 10 mile EPZ, organized by PAZ. However, information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Spotsylvania County is not provided. Provide information about the locations and populations of private schools or day-care centers and other special facilities within the 10-mile EPZ in Spotsylvania County.</p> <p>F.2 Information about the locations of recreation areas within the 10-mile EPZ and the maximum anticipated populations of these recreation areas is not included in the RERP. Provide information identifying the locations of recreation areas within the 10-mile EPZ in Spotsylvania County with associated information on the maximum anticipated populations.</p>	
<p>North Anna – 021</p>	<p>Subject: Mobility Impaired Considerations Basis: NUREG-0654 Evaluation Criterion J.10.d SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP does not specify transportation resources</p>	<p>State: (None)</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>(types and quantities) for moving individuals with special needs who are also mobility impaired. See also RAI North Anna – 006. Provide information on the types and quantities of transportation resources available to move the mobility impaired who have special needs.</p> <p>B. Caroline County The Caroline County RERP does not specify transportation resources (types and quantities) for moving individuals with special needs who are also mobility impaired. See also RAI North Anna – 006. Provide information on the types and quantities of transportation resources available to move the mobility impaired who have special needs.</p> <p>C. Hanover County The Hanover County RERP does not specify transportation resources (types and quantities) for moving individuals with special needs who are also mobility impaired. See also RAI North Anna – 006. Provide information on the types and quantities of transportation resources available to move the mobility impaired who have special needs.</p> <p>D. Orange County The Orange County RERP does not specify transportation resources (types and quantities) for moving individuals with special needs who are also mobility impaired. See also RAI North Anna – 006. Provide information on the types and quantities of transportation resources available to move the mobility impaired who have special needs.</p> <p>E. Spotsylvania County The Spotsylvania County RERP does not specify transportation resources (types and quantities) for moving individuals with special needs who are also mobility impaired. See also RAI North Anna – 006. Provide information on the types and quantities of transportation resources available to move the mobility impaired who have special needs.</p>	
<p>North Anna – 022</p>	<p>Subject: Use of Radioprotective Drugs (KI) Basis: NUREG-0654 Evaluation Criterion J.10.e SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 8, <i>Potassium</i></p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p><i>Iodide (KI) Administration</i>, states that the Virginia Department of Health (VDH) will be responsible for developing a KI distribution program for persons who live or work within the North Anna Power Station (NAPS) EPZ. It states that the public may voluntarily request and pick up KI pills from the local health department or other locations. VDH will be responsible for retaining KI supplies remaining on hand after shipment to local health districts. No actual quantities, specific storage locations, or storage conditions are listed. Provide information of specific quantities of KI at designated locations and storage condition requirements.</p> <p>B. Louisa County The Louisa County RERP, Appendix 8, <i>Public Health ESF Procedure</i>, states requirements of KI distribution but does not list quantities, specific storage locations, or storage conditions of KI. Provide information of specific quantities of KI at designated locations and storage condition requirements.</p> <p>C. Caroline County The Caroline County RERP, Appendix 8, <i>ESF #8 – Public Health Procedure</i>, states requirements of KI distribution but does not list quantities, specific storage locations, or storage conditions of KI. Provide information of specific quantities of KI at designated locations and storage condition requirements.</p> <p>D. Hanover County The Hanover County RERP, Appendix 8, <i>ESF #8 – Public Health Procedure</i>, states requirements of KI distribution but does not list quantities, specific storage locations, or storage conditions of KI. Provide information of specific quantities of KI at designated locations and storage condition requirements.</p> <p>E. Orange County The Orange County RERP Appendix 8, <i>Public Health ESF Procedure</i>, states requirements of KI distribution but does not list quantities, specific storage locations, or storage conditions of KI. Provide information of specific quantities of KI at designated locations and storage condition requirements.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Appendix 8, <i>ESF #8 – Public Health Procedure</i>, states requirements of KI distribution but does not list quantities, specific storage locations, or storage conditions of KI. Provide information of specific quantities of KI at designated</p>	

RAI Number	RAI Description	RAI For
	locations and storage condition requirements.	
North Anna – 023	<p>Subject: Administration of Radioprotective Drugs (KI) Basis: NUREG-0654 Evaluation Criterion J.10.f SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia.</p> <p>A.1 The Commonwealth of Virginia RERP, Appendix 8, <i>Potassium Iodide (KI) Administration</i>, states that the State Health Commissioner may recommend or advise KI to be ingested by the general public and emergency workers when a dose assessment predicts a thyroid exposure threshold of 5 rem or if an actual measurement of 5 rem is obtained offsite. In other parts of the COVRERP, the threshold is incorrectly listed as “25 rem CDE (thyroid).” Provide the correct threshold (5 rem CDE, Thyroid) for the recommended ingestion of KI throughout the COVRERP.</p> <p>A.2 The Virginia Department of Health/Division of Radiological Health ERP lists the administration of KI dose limit for emergency workers as 5 rem CDE thyroid in some locations and as 25 rem CDE thyroid in others. Provide the correct threshold (5 rem CDE, Thyroid) for the recommended ingestion of KI throughout the plan.</p> <p>B. Louisa County The Louisa County RERP lists the administration of KI dose limit for emergency workers as 5 rem CDE thyroid in some locations and as 25 rem CDE thyroid in others. Provide the correct threshold (5 rem CDE, Thyroid) for the recommended ingestion of KI throughout the plan.</p> <p>C. Caroline County The Caroline County RERP lists the administration of KI dose limit for emergency workers as 5 rem CDE thyroid in some locations and as 25 rem CDE thyroid in others. Provide the correct threshold (5 rem CDE, Thyroid) for the recommended ingestion of KI throughout the plan.</p> <p>D. Hanover County The Hanover County RERP lists the administration of KI dose limit for emergency workers as 5 rem CDE thyroid in some locations and as 25 rem CDE thyroid in others. Provide the correct threshold (5 rem CDE, Thyroid) for the recommended ingestion of KI throughout the plan.</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>E. Orange County The Orange County RERP lists the administration of KI dose limit for emergency workers as 5 rem CDE thyroid in some locations and as 25 rem CDE thyroid in others. Provide the correct threshold (5 rem CDE, Thyroid) for the recommended ingestion of KI throughout the plan.</p> <p>F. Spotsylvania County The Spotsylvania County RERP lists the administration of KI dose limit for emergency workers as 5 rem CDE thyroid in some locations and as 25 rem CDE thyroid in others. Provide the correct threshold (5 rem CDE, Thyroid) for the recommended ingestion of KI throughout the plan.</p>	
<p>North Anna – 024</p>	<p>Subject: Means of Relocation Basis: NUREG-0654 Evaluation Criterion J.10.g SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP Basic Plan, Attachment 8, <i>Permanent Resident Population Data by County within NAPS 10-mile EPZ</i>, is a table providing information on the permanent resident population data by County. Non-auto owning households for each county are shown. This information is not current with the updated Evacuation Time Estimate conducted by KLD and Associates, 2007. Provide information for determining the number of persons who may need assistance for each planning area and provide updated information on the permanent resident population data.</p> <p>B. Caroline County The Caroline County RERP Basic Plan, Attachment 8, <i>Permanent Resident Population Data by County within NAPS 10-mile EPZ</i>, is a table providing information on the permanent resident population data by County. Non-auto owning households for each county are shown. This information is not current with the updated Evacuation Time Estimate conducted by KLD and Associates, 2007. Provide information for determining the number of persons who may need assistance for each planning area and provide updated information on the permanent resident population data.</p> <p>C. Hanover County The Hanover County RERP Basic Plan, Attachment 8, <i>Permanent Resident Population Data by County within NPS 10-mile EPZ</i>, is a</p>	<p>State: (None)</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>table providing information on the permanent resident population data by County. Non-auto owning households for each county are shown. According to the information presented, only 50 people in the County do not have access to a vehicle for transportation. This information is not current with the updated Evacuation Time Estimate conducted by KLD and Associates, 2007. Provide information for determining the number of persons who may need assistance for each planning area and provide updated information on the permanent resident population data.</p> <p>D. Orange County The Orange County RERP-Attachments 7, <i>Population by Sectors North Anna Power Station</i>, and 8, <i>Permanent Resident Population Data by County within NAPS 10-mile EPZ</i>, provides information on the permanent resident population data by County. Non-auto owning households and non-auto owning population for each county are shown. This information is not current with the updated Evacuation Time Estimate conducted by KLD and Associates, 2007. Provide information for determining the number of persons who may need assistance for each planning area and provide updated information on the permanent resident population data.</p> <p>E. Spotsylvania County The Spotsylvania County RERP Basic Plan, Attachment 8, <i>Permanent Resident Population Data by County within NAPS 10-mile EPZ</i>, is a table providing information on the permanent resident population data by County. Non-auto owning households for each county are shown. According to the information presented, only 50 people in the County do not have access to a vehicle for transportation. This information is not current with the updated Evacuation Time Estimate conducted by KLD and Associates, 2007. Provide information for determining the number of persons who may need assistance for each planning area and provide updated information on the permanent resident population data.</p>	
<p>North Anna – 025</p>	<p>Subject: Relocation Centers Basis: NUREG-0654 Evaluation Criterion J.10.h SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Annex F, <i>ESF #6 – Mass Care, Housing, and Human Services</i>, lists the North Anna Power Station Evacuation Assembly Centers; Patrick Henry High School (located in Hanover County) is footnoted as a “host school for</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>Louisa County.” However, in the COL Application, Figure II-4, it is labeled as a “State Evacuation Assembly Center.” Provide clarification as to whether Patrick Henry High School is only a host school for Louisa County or if it also an Evacuation Assembly Center.</p> <p>B. Louisa County Louisa County RERP, Section V.D, <i>Situation, Protection Against the Hazard</i>, states that Louisa County has one Evacuation Assembly Center (EAC): Trevilian Elementary School, located more than 15 miles from NAPS. The plan does not provide the address for the EAC, the capacity, and if it is accessible to individuals with disabilities. Provide information for the EAC address, capacity, and accessibility.</p> <p>C. Caroline County The Caroline County RERP, Section V.D, <i>Situation, Protection Against the Hazard</i>, states that Caroline County has two Evacuation Assembly Centers: Caroline County Middle School and Caroline County High School, both located more than 15 miles from NAPS. The plan does not provide the addresses for the EACs, the capacities, and if they are accessible to individuals with disabilities. Provide information for the EAC address, capacities, and accessibility.</p> <p>D. Hanover County The Hanover County RERP, Section V.D, <i>Situation, Protection Against the Hazard</i>, states that Hanover County has two Evacuation Assembly Centers: Liberty Middle School and Patrick Henry High School, both located more than 15 miles from NAPS. The plan does not provide the addresses for the EACs, the capacities, and if they are accessible to individuals with disabilities. Provide information for the EAC address, capacities, and accessibility.</p> <p>E. Orange County E.1 The Orange County RERP, Section V.D, <i>Situation, Protection Against the Hazard</i>, states that Orange County has an Evacuation Assembly Center and that it is located more than 15 miles from NAPS. The plan does not provide the address for the EAC, the capacity, and if it is accessible to individuals with disabilities. Provide information for the EAC address, capacity, and accessibility. E.2 Orange County RERP, Appendix 3, <i>Mass Care ESF Procedure</i>, identifies the EAC for Orange County as Prospect Heights</p>	

RAI Number	RAI Description	RAI For
	<p>Middle School. Gordon-Barbour Elementary School is identified as the host reception center for Louisa County. This is not consistent with the State Plan which also lists Orange County High School as an EAC for the county and Patrick Henry High School in Hanover County as the host reception center for Louisa County. Provide information identifying all EACs and host reception centers within the county.</p> <p>E.3 Orange County RERP, Appendix 3, <i>Mass Care ESF Procedure</i>, does not identify who is the lead organization responsible for managing the Evacuation Assembly Center (EAC). Provide information identifying the lead organization responsible for managing the EAC.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Section V.D, <i>Situation, Protection Against the Hazard</i>, states that Spotsylvania County has three Evacuation Assembly Centers (EACs): Courtland High School, Chancellor High School, and Massaponax High School, all located more than 15 miles from NAPS. The plan does not provide the addresses for the EACs, the capacities, and if they are accessible individuals with disabilities. Provide information for the EACs addresses, capacities, and accessibility.</p>	
<p>North Anna – 026</p>	<p>Subject: Evacuation Route Traffic Capacity Basis: NUREG-0654 Evaluation Criterion J.10.i SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 5 <i>Emergency Response</i>, provides a brief summary of the outdated Evacuation Time Estimate Study conducted by Innovative Emergency Management, 2001. Traffic capacity of the evacuation routes is not addressed. The Evacuation Time Estimate Study was revised and updated by KLD and associates, October 2007. The study was substantially revised from the previous study, including the traffic capacity of the evacuation routes. Provide updated information in the plan to incorporate the revised ETE study and evaluate factors that might limit the capability to effect a timely, safe evacuation.</p> <p>B. Louisa County The Louisa County RERP, Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a brief summary of the outdated Evacuation time Estimate Study conducted by Innovative Emergency Management, 2001. Traffic capacity of the evacuation</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>routes is not addressed. The Evacuation Time Estimate Study was revised and updated by KLD and associates, October 2007. The study was substantially revised from the previous study, including the traffic capacity of the evacuation routes. Provide updated information in the plan to incorporate the revised ETE study, including updated county evacuation route maps, and evaluate factors that might limit the capability to effect a timely, safe evacuation.</p> <p>C. Caroline County The Caroline County RERP, Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a brief summary of the outdated Evacuation time Estimate Study conducted by Innovative Emergency Management, 2001. Traffic capacity of the evacuation routes is not addressed. The Evacuation Time Estimate Study was revised and updated by KLD and associates, October 2007. The study was substantially revised from the previous study, including the traffic capacity of the evacuation routes. Provide updated information in the plan to incorporate the revised ETE study, including updated county evacuation route maps, and evaluate factors that might limit the capability to effect a timely, safe evacuation.</p> <p>D. Hanover County The Hanover County RERP, Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a brief summary of the outdated Evacuation time Estimate Study conducted by Innovative Emergency Management, 2001. Traffic capacity of the evacuation routes is not addressed. The Evacuation Time Estimate Study was revised and updated by KLD and associates, October 2007. The study was substantially revised from the previous study, including the traffic capacity of the evacuation routes. Provide updated information in the plan to incorporate the revised ETE study, including updated county evacuation route maps, and evaluate factors that might limit the capability to effect a timely, safe evacuation.</p> <p>E. Orange County The Orange County RERP, Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a brief summary of the outdated Evacuation time Estimate Study conducted by Innovative Emergency Management, 2001. Traffic capacity of the evacuation routes is not addressed. The Evacuation Time Estimate Study was revised and updated by KLD and associates, October 2007. The</p>	

RAI Number	RAI Description	RAI For
	<p>study was substantially revised from the previous study, including the traffic capacity of the evacuation routes. Provide updated information in the plan to incorporate the revised ETE study, including updated county evacuation route maps, and evaluate factors that might limit the capability to effect a timely, safe evacuation.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a brief summary of the outdated Evacuation time Estimate Study conducted by Innovative Emergency Management, 2001. Traffic capacity of the evacuation routes is not addressed. The Evacuation Time Estimate Study was revised and updated by KLD and associates, October 2007. The study was substantially revised from the previous study, including the traffic capacity of the evacuation routes. Provide updated information in the plan to incorporate the revised ETE study, including updated county evacuation route maps, and evaluate factors that might limit the capability to effect a timely, safe evacuation.</p>	
<p>North Anna – 027</p>	<p>Subject: Evacuation Route Impediments Basis: NUREG-0654 Evaluation Criterion J.10.k SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP, Appendix 4, <i>Law Enforcement ESF Procedure</i>, states that Law Enforcement is responsible for clearing any impediments. Resources available (manpower and equipment resources) that will be used to clear impediments in the event of an emergency are not identified in the plan. Provide information referencing the resources available to be used in clearing impediments.</p> <p>B. Caroline County The Caroline County RERP, Appendix 13, <i>ESF #13 Public Safety and Security Procedure</i>, states that Law Enforcement is responsible for clearing any impediments. Resources available (manpower and equipment resources) that will be used to clear impediments in the event of an emergency are not identified in the plan. Provide information referencing the resources available to be used in clearing impediments.</p> <p>C. Hanover County</p>	<p>State: (None)</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>The Hanover County RERP, Appendix 13, <i>ESF #13 Public Safety and Security Procedure</i>, states that Law Enforcement is responsible for clearing any impediments. Resources available (manpower and equipment resources) that will be used to clear impediments in the event of an emergency are not identified in the plan. Provide information referencing the resources available to be used in clearing impediments.</p> <p>D. Orange County The Orange County RERP, Appendix 4, <i>Law Enforcement ESF Procedure</i>, does not list clearing impediments as a function of law enforcement. The procedure does not address removal of impediments. Provide information about which organization is in charge of clearing impediments and resources available to be used in clearing impediments.</p> <p>E. Spotsylvania County The Spotsylvania County RERP, Appendix 13, <i>ESF #13 Public Safety and Security Procedure</i>, states that Law Enforcement is responsible for clearing any impediments. Resources available (manpower and equipment resources) that will be used to clear impediments in the event of an emergency are not identified in the plan. Provide information referencing resources available to be used in clearing impediments.</p>	
<p>North Anna – 028</p>	<p>Subject: Evacuation Route Time Estimates Basis: NUREG-0654 Evaluation Criterion J.10.1 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 5, <i>Emergency Response</i>, provides a summary of the Evacuation Time Estimate (ETE) for the NAPS area, conducted by Innovative Emergency Management, 2001. Time estimates for special population groups are not provided. The non-ambulatory population is not addressed. The ETE was revised by KLD Associates, Inc, October 2007. Population data was updated and the scenarios to calculate evacuation time estimates were revised from the previous study. Provide updated information incorporating the new ETE study including revised population data and separate time estimates for the special population groups.</p> <p>B. Louisa County The Louisa County RERP Attachment 11, <i>Evacuation Time</i>.</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p><i>Estimate for NAPS</i>, provides a table which summarizes the results of the ETE Study conducted by Innovative Emergency Management, 2001 for the North Anna Power Station Area. Time estimates for special population groups are not provided. The non-ambulatory population is not addressed. The ETE was revised by KLD Associates, Inc; October 2007. Population data was updated and the scenarios to calculate evacuation time estimates were revised from the previous study. Provide updated information incorporating the new ETE study including revised population data and separate time estimates for the special population groups.</p> <p>C. Caroline County The Caroline County RERP Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a table which summarizes the results of the ETE Study conducted by Innovative Emergency Management, 2001 for the North Anna Power Station Area. Time estimates for special population groups are not provided. The non-ambulatory population is not addressed. The ETE was revised by KLD Associates, Inc, October 2007. Population data was updated and the scenarios to calculate evacuation time estimates were revised from the previous study. Provide updated information incorporating the new ETE study including revised population data and separate time estimates for the special population groups.</p> <p>D. Hanover County The Hanover County RERP Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a table which summarizes the results of the ETE Study conducted by Innovative Emergency Management, 2001 for the North Anna Power Station Area. Time estimates for special population groups are not provided. The non-ambulatory population is not addressed. The ETE was revised by KLD Associates, Inc, October 2007. Population data was updated and the scenarios to calculate evacuation time estimates were revised from the previous study. Provide updated information incorporating the new ETE study including revised population data and separate time estimates for the special population groups.</p> <p>E. Orange County The Orange County RERP Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a table which summarizes the results of the ETE Study conducted by Innovative Emergency Management, 2001 for the North Anna Power Station Area. Time estimates for special population groups are not provided. The non-ambulatory population is not addressed. The ETE was revised by KLD</p>	

RAI Number	RAI Description	RAI For
	<p>Associates, Inc, October 2007. Population data was updated and the scenarios to calculate evacuation time estimates were revised from the previous study. Provide updated information incorporating the new ETE study including revised population data and separate time estimates for the special population groups.</p> <p>F. Spotsylvania County The Spotsylvania County RERP Attachment 11, <i>Evacuation Time Estimate for NAPS</i>, provides a table which summarizes the results of the ETE Study conducted by Innovative Emergency Management, 2001 for the North Anna Power Station Area. Time estimates for special population groups are not provided. The non-ambulatory population is not addressed. The ETE was revised by KLD Associates, Inc; October 2007. Population data was updated and the scenarios to calculate evacuation time estimates were revised from the previous study. Provide updated information incorporating the new ETE study including revised population data and separate time estimates for the special population groups.</p>	
<p>North Anna – 029</p>	<p>Subject: Ingestion Pathway Protective Measures Basis: NUREG-0654 Evaluation Criterion J.11 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia A.1 The Commonwealth of Virginia RERP, Appendix 2, Section I.A, <i>Task Assignments</i>, lists the responsibilities of the Department of Agricultural and Consumer Services to include the taking of milk, meat, and food samples; coordinating the control and disposition of radiologically-contaminated food, milk, animal feed, and farm animals; and coordinating the provision of uncontaminated feed for dairy cattle and other farm animals. Annex J, <i>ESF #11 – Agriculture and Natural Resources</i>, lists these same responsibilities and those of the Virginia Cooperative Extension. The COVRERP does not contain the following: the criteria for putting animals on stored feed; the identification and description of procedures for detecting contamination, for estimating the dose commitment consequences from the ingestion pathway and for imposing protective measures; and maps showing general crop information, farms, dairies, food processing plants, watershed, water supply intake and treatment plants and reservoirs. Provide the information required by this criterion. A.2 The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 17, <i>Standing Operating</i></p>	<p>State: VA/MD</p> <p>County: (None)</p>

RAI Number	RAI Description	RAI For
	<p><i>Procedures</i>, lists SOPs for post-plume dose projection procedures and post-plume pathway package. However, these references were not available for review. The VDH/DRH ERP does not contain the following: the criteria for putting animals on stored feed; the identification and description of procedures for detecting contamination, for estimating the dose commitment consequences from the ingestion pathway and for imposing protective measures; and maps showing general crop information, farms, dairies, food processing plants, watershed, water supply intake and treatment plants and reservoirs. Provide the information required by this criterion.</p> <p>B. The State of Maryland RERP was not provided for review. The 50-mile ingestion pathway planning zones extends into Maryland. Provide the State of Maryland RERP.</p>	
<p>North Anna – 030</p>	<p>Subject: Evacuee Monitoring and Registration Basis: NUREG-0654 Evaluation Criterion J.12 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP, Appendix 3, Tab B, Attachment 8, <i>Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52</i>, provides instructions for portal monitoring. The portal monitor will be source checked by stepping into the portal and by holding the check source of a Ludlum 2240 near the opening of one of the detectors. Alarms are set at the side, head, and foot sections. This is not consistent with FEMA-REP-21, <i>Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response</i>. Provide information showing the portal monitoring operability check complies with the standard.</p> <p>B. Caroline County The Caroline County RERP, Appendix 6, Tab B, Attachment 8, <i>ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52</i>, provides instructions for portal monitoring. The portal monitor will be source checked by stepping into the portal and by holding the check source of a Ludlum 2240 near the opening of one of the detectors. Alarms are set at the side, head, and foot sections. This is not consistent with FEMA-REP-21, <i>Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response</i>. Provide information showing the portal monitoring operability</p>	<p>State: (None)</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>check complies with the standard.</p> <p>C. Hanover County The Hanover County RERP, Appendix 6, Tab B, Attachment 8, <i>ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52</i>, provides instructions for portal monitoring. The portal monitor will be source checked by stepping into the portal and by holding the check source of a Ludlum 2240 near the opening of one of the detectors. Alarms are set at the side, head, and foot sections. This is not consistent with FEMA-REP-21, <i>Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response</i>. Provide information showing the portal monitoring operability check complies with the standard.</p> <p>D. Orange County The Orange County RERP, Appendix 3, Tab B, Attachment 8, <i>Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52</i>, provides instructions for portal monitoring. The portal monitor will be source checked by stepping into the portal and by holding the check source of a Ludlum 2240 near the opening of one of the detectors. Alarms are set at the side, head, and foot sections. This is not consistent with FEMA-REP-21, <i>Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response</i>. Provide information showing the portal monitoring operability check complies with the standard.</p> <p>E. Spotsylvania County The Spotsylvania County RERP, Appendix 6, Tab B, Attachment 8, <i>ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52</i>, provides instructions for portal monitoring. The portal monitor will be source checked by stepping into the portal and by holding the check source of a Ludlum 2240 near the opening of one of the detectors. Alarms are set at the side, head, and foot sections. This is not consistent with FEMA-REP-21, <i>Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response</i>. Provide information showing the portal monitoring operability check complies with the standard.</p>	

RAI Number	RAI Description	RAI For
<p>North Anna – 031</p>	<p>Subject: Emergency Worker Dose Control Basis: NUREG-0654 Evaluation Criterion K.3.a SRP ACCEPTANCE CRITERION: Requirement H)</p> <p>A. Commonwealth of Virginia</p> <p>A.1 The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 6, <i>Radiological Exposure Control</i>, lists the correct Emergency Worker Exposure Limits in step 2.1, but then refers to incorrect limits in step 2.4. The VDH/DRH ERP lists the exposure control ratio as initially 2. The correct administrative exposure limits have not been carried through the state and local plans. There are numerous inconsistencies throughout the plans in exposure limits, exposure control ratios, and radiation units [exposure (R) and dose (Rem)]. Provide revisions to all sections of the plans to ensure that all instances of the administrative exposure limits are correct and that the appropriate exposure or dose units and exposure control ratios are used throughout the plans.</p> <p>A.2 The Commonwealth of Virginia RERP, Tab B2 to Appendix 7, <i>Radiological Exposure Control</i>, lists the correct administrative exposure limits. Tab G to Appendix 7 lists incorrect limits. In addition, Tab B2 to Appendix 7 incorrectly lists the “EPA Protective Action Guidelines, Emergency Worker Exposure Limits.” There are numerous inconsistencies throughout the plans in exposure limits, exposure control ratios (initially set to 2, not 3), and radiation units [exposure (R) and dose (Rem)]. Provide revisions to all sections of the plans to ensure that all instances of the administrative exposure limits are correct and that the appropriate exposure or dose units and exposure control ratios are used throughout the plans.</p> <p>B. Louisa County</p> <p>In the Louisa County RERP, there are numerous inconsistencies in administrative exposure limits, exposure control ratios (initially set to 2, not 3), and radiation units [exposure (R) and dose (Rem)]. Provide revisions to all sections of the plans to ensure that all instances of the administrative exposure limits are correct and that the appropriate exposure or dose units and exposure control ratios are used throughout the plans.</p> <p>C. Caroline County</p> <p>In the Caroline County RERP, there are numerous inconsistencies in administrative exposure limits, exposure control ratios (initially set to 2, not 3), and radiation units [exposure (R) and dose (Rem)].</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>Provide revisions to all sections of the plans to ensure that all instances of the administrative exposure limits are correct and that the appropriate exposure or dose units and exposure control ratios are used throughout the plans.</p> <p>D. Hanover County In the Hanover County RERP, there are numerous inconsistencies in administrative exposure limits, exposure control ratios (initially set to 2, not 3), and radiation units [exposure (R) and dose (Rem)]. Provide revisions to all sections of the plans to ensure that all instances of the administrative exposure limits are correct and that the appropriate exposure or dose units and exposure control ratios are used throughout the plans.</p> <p>E. Orange County In the Orange County RERP, there are numerous inconsistencies in administrative exposure limits, exposure control ratios (initially set to 2, not 3), and radiation units [exposure (R) and dose (Rem)]. Provide revisions to all sections of the plans to ensure that all instances of the administrative exposure limits are correct and that the appropriate exposure or dose units and exposure control ratios are used throughout the plans.</p> <p>F. Spotsylvania County In the Spotsylvania County RERP, there are numerous inconsistencies in administrative exposure limits, exposure control ratios (initially set to 2, not 3), and radiation units [exposure (R) and dose (Rem)]. Provide revisions to all sections of the plans to ensure that all instances of the administrative exposure limits are correct and that the appropriate exposure or dose units and exposure control ratios are used throughout the plans.</p>	
<p>North Anna – 032</p>	<p>Subject: Emergency Worker Dose Authorization Basis: NUREG-0654 Evaluation Criterion K.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 6, <i>Radiological Exposure Control</i>, states that VDH/DRH will provide authorization, when needed, for any State emergency worker to exceed the 15 R TEDE turn back level during an emergency. However, the turnback dose level set by VDH/DRH is 5 Rem (Total Effective dose Equivalent (TEDE) (or 2.5 R on a self-reading dosimeter). There are numerous</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>inconsistencies throughout the plans in exposure limits, exposure control ratios, and radiation units [exposure (R) and dose (Rem)] as detailed in Criterion K.3.a. Appendix 6 references a worker exposure control procedure in Appendix 17, which was not provided for review. Provide information about the procedure to authorize high exposure limits to emergency workers.</p> <p>B. Louisa County</p> <p>B.1 The Louisa County RERP Appendix 3, Tab A, Attachment 5, <i>Mass Care ESF Procedure, Bus Driver Procedure</i>, says the bus driver will read dosimetry every 30 minutes and record findings on Form REC-1 and report any changes to the radiological officer. Attachment 7, <i>Radiological Officer Briefing Form for School Bus Drivers</i>, of that same Appendix does not instruct the bus driver on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits. Provide information for bus drivers, including exposure briefing and authorization process to voluntarily exceed exposure limits.</p> <p>B.2 Louisa County RERP Appendix 6, Tab B, <i>Hazardous Materials ESF Procedure, Field Monitoring Team Procedure</i>, does not include the process description for requesting and receiving authorization to voluntarily exceed any of the exposure levels. Provide authorization process for field team members to voluntarily exceed exposure limits.</p> <p>C. Caroline County</p> <p>C.1 The Caroline County RERP Appendix 6, Tab A, Attachment 2, <i>ESF #6 – Mass Care Procedure, Bus Driver Procedure</i>, says the bus driver will read dosimetry every 30 minutes and record findings on Form REC-1 and report any changes to the radiological officer. Attachment 8, <i>Radiological Officer Briefing Form for School Bus Drivers</i>, of that same Appendix does not instruct the bus driver on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits. Provide information for bus drivers, including exposure briefing and authorization process to voluntarily exceed exposure limits.</p> <p>C.2 The Caroline County RERP Appendix 10, Tab B, <i>ESF #10 – Oil and Hazardous Materials ESF Procedure, Field Monitoring Team Procedure</i>, does not include detailed process description for requesting and receiving authorization to voluntarily exceed any of the exposure levels. Provide authorization process for field team members to voluntarily</p>	

RAI Number	RAI Description	RAI For
	<p>exceed exposure limits.</p> <p>D. Hanover County</p> <p>D.1 Hanover County RERP Appendix 6, Tab A, Attachment 2, <i>ESF #6 – Mass Care Procedure, Bus Driver Procedure</i>, says the bus driver will read dosimetry every 30 minutes and record findings on Form REC-1 and report any changes to the radiological officer. Attachment 8, <i>Radiological Officer Briefing Form for School Bus Drivers</i>, of that same Appendix does not instruct the bus driver on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits. Provide information for bus drivers, including exposure briefing and authorization process to voluntarily exceed exposure limits.</p> <p>D.2 Hanover County RERP Appendix 10, Tab B, <i>ESF #10 – Oil and Hazardous Materials Procedure, Field Monitoring Team Procedure</i>, does not include detailed process description for requesting and receiving authorization to voluntarily exceed any of the exposure levels. Provide authorization process for field team members to voluntarily exceed exposure limits.</p> <p>E. Orange County</p> <p>E.1 The Orange County RERP Appendix 3, Tab A, Attachment 5, <i>Mass Care ESF Procedure, Bus Driver Procedure</i>, says the bus driver will read dosimetry every 30 minutes and record findings on Form REC-1 and report any changes to the radiological officer. Attachment 8, <i>Radiological Officer Briefing Form for School Bus Drivers</i>, of that same Appendix does not instruct the bus driver on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits. Provide information for bus drivers, including exposure briefing and authorization process to voluntarily exceed exposure limits.</p> <p>E.2 Orange County RERP Appendix 6, Tab B, <i>Hazardous Materials ESF Procedure, Field Monitoring Team Procedure</i>, does not include detailed process description for requesting and receiving authorization to voluntarily exceed any of the exposure levels. Provide authorization process for field team members to voluntarily exceed exposure limits.</p> <p>F. Spotsylvania County</p> <p>F.1 Spotsylvania County RERP Appendix 6, Tab A, Attachment 5, <i>ESF #6 – Mass Care Procedure, Bus Driver Procedure</i>, says the bus driver will read dosimetry every 30 minutes and record</p>	

RAI Number	RAI Description	RAI For
	<p>findings on Form REC-1 and report any changes to the radiological officer. Attachment 10, <i>Radiological Officer Briefing Form for School Bus Drivers</i>, of that same Appendix does not instruct the bus driver on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits. Provide information for bus drivers, including exposure briefing and authorization process to voluntarily exceed exposure limits.</p> <p>F.2 Spotsylvania County RERP Appendix 10, Tab B, <i>ESF #10 – Oil and Hazardous Materials Procedure, Field Monitoring Team Procedure</i>, does not include detailed process description for requesting and receiving authorization to voluntarily exceed any of the exposure levels. Provide authorization process for field team members to voluntarily exceed exposure limits.</p>	
<p>North Anna – 033</p>	<p>Subject: Decontamination Action Levels Basis: NUREG-0654 Evaluation Criterion K.5.a SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP Appendix 3, Tab B, <i>Mass Care ESF – Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle and personnel monitoring. There are no procedures for monitoring the interior of emergency vehicles. Interior surfaces such as the seats, steering wheel, foot pedals, should be monitored. Monitoring should also include any area where emergency equipment is placed. Provide information on monitoring the interior of emergency vehicles.</p> <p>B. Caroline County The Caroline County RERP, Appendix 6, Tab B, <i>ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle and personnel monitoring. There are no procedures for monitoring the interior of emergency vehicles. Interior surfaces such as the seats, steering wheel, foot pedals, should be monitored. Monitoring should also include any area where emergency equipment is placed. Provide information on monitoring the interior of emergency vehicles.</p> <p>C. Hanover County The Hanover County RERP, Appendix 6, Tab B, <i>ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation</i></p>	<p>State: (None)</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p><i>Procedure</i>, details vehicle and personnel monitoring. There are no procedures for monitoring the interior of emergency vehicles. Interior surfaces such as the seats, steering wheel, foot pedals, should be monitored. Monitoring should also include any area where emergency equipment is placed. Provide information on monitoring the interior of emergency vehicles.</p> <p>D. Orange County The Orange County RERP, Appendix 3, Tab B, <i>Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle and personnel monitoring. There are no procedures for monitoring the interior of emergency vehicles. Interior surfaces such as the seats, steering wheel, foot pedals, should be monitored. Monitoring should also include any area where emergency equipment is placed. Provide information on monitoring the interior of emergency vehicles.</p> <p>E. Spotsylvania County The Spotsylvania County RERP, Appendix 6, Tab B, <i>ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle and personnel monitoring. There are no procedures for monitoring the interior of emergency vehicles. Interior surfaces such as the seats, steering wheel, foot pedals, should be monitored. Monitoring should also include any area where emergency equipment is placed. Provide information on monitoring the interior of emergency vehicles.</p>	
<p>North Anna – 034</p>	<p>Subject: Decontamination Material Control Basis: NUREG-0654 Evaluation Criterion K.5.b SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP, Appendix 3, Tab B, <i>Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle, equipment, and personnel monitoring.</p> <p>A.1 All unchecked or contaminated equipment is sealed in the tool drop drum and remains there until the licensee monitors and/or recovers contaminated equipment. There is no area identified for where the drum will be stored. Provide information on secured storage areas for contaminated equipment.</p> <p>A.2 There is no provision for field team members doffing their protective clothing prior to being monitored for contamination. Provide information on the doffing of personal protective clothing prior to initial monitoring.</p>	<p>State: (None)</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>B. Caroline County Caroline County RERP, Appendix 6, Tab B, <i>ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle, equipment, and personnel monitoring.</p> <p>B.1 All unchecked or contaminated equipment is sealed in the tool drop drum and remains there until the licensee monitors and/or recovers contaminated equipment. There is no area identified for where the drum will be stored. Provide information on secured storage areas for contaminated equipment.</p> <p>B.2 There is no provision for field team members doffing their protective clothing prior to being monitored for contamination. Provide information on the doffing of personal protective clothing prior to initial monitoring.</p> <p>C. Hanover County Hanover County RERP, Appendix 6, Tab B, <i>ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle, equipment, and personnel monitoring.</p> <p>C.1 All unchecked or contaminated equipment is sealed in the tool drop drum and remains there until the licensee monitors and/or recovers contaminated equipment. There is no area identified for where the drum will be stored. Provide information on secured storage areas for contaminated equipment.</p> <p>C.2 There is no provision for field team members doffing their protective clothing prior to being monitored for contamination. Provide information on the doffing of personal protective clothing prior to initial monitoring.</p> <p>D. Orange County The Orange County RERP, Appendix 3, Tab B, <i>Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle, equipment, and personnel monitoring.</p> <p>D.1 All unchecked or contaminated equipment is sealed in the tool drop drum and remains there until the licensee monitors and/or recovers contaminated equipment. There is no area identified for where the drum will be stored. Provide information on secured storage areas for contaminated equipment.</p> <p>D.2 There is no provision for field team members doffing their protective clothing prior to being monitored for contamination. Provide information on the doffing of personal protective clothing prior to initial monitoring.</p> <p>E. Spotsylvania County RERP, Appendix 6, Tab B, <i>ESF #6 – Mass</i></p>	

RAI Number	RAI Description	RAI For
	<p><i>Care Procedure, Evacuation Assembly Center Operation Procedure</i>, details vehicle, equipment, and personnel monitoring.</p> <p>E.1 All unchecked or contaminated equipment is sealed in the tool drop drum and remains there until the licensee monitors and/or recovers contaminated equipment. There is no area identified for where the drum will be stored. Provide information on secured storage areas for contaminated equipment.</p> <p>E.2 There is no provision for field team members doffing their protective clothing prior to being monitored for contamination. Provide information on the doffing of personal protective clothing prior to initial monitoring.</p>	
<p>North Anna - 035</p>	<p>Subject: Hospitals for Contaminated/Injured Patients Basis: NUREG-0654 Evaluation Criterion L.1 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Annex H, <i>ESF #8, Public Health and Medical Services</i>, states (Item I.A.5) that the Department of Health will determine the availability of and coordinate the use of medical facilities that could accommodate and care for persons involved in a radiological emergency who may require medical care. The Medical College of Virginia (MCV) Hospital, in Richmond, will act as the primary hospital for an individual that is both contaminated and injured. Mary Washington Hospital, in Fredericksburg, is designated as the back-up hospital. Plans for these two hospitals were not provided for review. Provide appropriate plans for the primary and back-up hospitals that demonstrate the hospital has the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p> <p>B. Louisa County The Louisa County RERP does not list the primary and back-up hospitals. Provide information identifying the primary and back-up hospitals and support information demonstrating that they have the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p> <p>C. Caroline County The Caroline County RERP does not list the primary and back-up hospitals. Provide information identifying the primary and back-up</p>	<p>State: VA</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>hospitals and support information demonstrating that they have the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p> <p>D. Hanover County The Hanover County RERP does not list the primary and back-up hospitals. Provide information identifying the primary and back-up hospitals and support information demonstrating that they have the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p> <p>E. Orange County The Orange County RERP does not list the primary and back-up hospitals. Provide information identifying the primary and back-up hospitals and support information demonstrating that they have the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p> <p>F. Spotsylvania County The Spotsylvania County RERP does not list the primary and back-up hospitals. Provide information identifying the primary and back-up hospitals and support information demonstrating that they have the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p>	
<p>North Anna – 036</p>	<p>Subject: Medical Services for Contaminated/Injured Patients Basis: NUREG-0654 Evaluation Criterion L.3 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Annex H, <i>ESF #8, Public Health and Medical Services</i>, specifies (Item I.A.5) that the Department of Health will determine the availability of and coordinate the use of medical facilities that could accommodate and care for persons involved in a radiological emergency that may require medical care. In addition to the primary and back-up hospitals, Annex H, Tab A includes a list of “other hospitals with radiological response capabilities” and states that some of the hospitals listed do not have radiation detection equipment. It is not stated how hospitals that do not have detection equipment can have</p>	<p>State: VA</p> <p>County: (None)</p>

RAI Number	RAI Description	RAI For
	<p>radiological response capabilities. The COVRERP does not specifically state that the listed hospitals have individuals on their staffs that are trained in handling radiologically contaminated persons with medical needs. COVRERP does not provide other relevant details about the listed hospitals, such as specific location and capacities for ambulatory and non-ambulatory individuals. Provide relevant information for the list of additional hospitals including qualifications to handle contaminated injured patients, equipment for radiological response capabilities, specific locations, and capacities for ambulatory and non-ambulatory individuals.</p>	
<p>North Anna – 037</p>	<p>Subject: Medical Transport of Contaminated/Injured Patients Basis: NUREG-0654 Evaluation Criterion L.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP, Appendix 10, <i>Firefighting ESF Procedure</i>, states that a Dominion Health Physicist will be available to the rescue [squad] to ride with the ambulance to the hospital and will conduct all monitoring of the patient. Information is not provided on how the Dominion Health Physicist will meet the rescue squad at the appropriate location (if the contaminated injured individual is not at the North Anna Power Station (NAPS) site). Provide information on how contaminated, injured individuals will be monitored for contamination if the individual is a member of the public and not being transported from the NAPS site.</p> <p>B. Caroline County The Caroline County RERP does not contain EMS information about the transport of contaminated injured individuals who are members of the public. Provide information about the transport of contaminated injured members of the public.</p> <p>C. Hanover County The Hanover County RERP does not contain EMS information about the transport of contaminated injured individuals who are members of the public. Provide information about the transport of contaminated injured members of the public.</p> <p>D. Orange County Orange County RERP does not provide a procedure for transporting contaminated injured individuals to a hospital. Provide information about the transport of contaminated injured members of the public.</p>	<p>State: (None)</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>E. Spotsylvania County The Spotsylvania County RERP does not contain EMS information about the transport of contaminated injured individuals who are members of the public. Provide information about the transport of contaminated injured members of the public.</p>	
<p>North Anna – 038</p>	<p>Subject: Recovery and Reentry Procedures Basis: NUREG-0654 Evaluation Criterion M.1 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia</p> <p>A.1- The Commonwealth of Virginia RERP, Appendix 2, <i>Task Assignments</i>, discusses permanent relocation of individuals and households evacuated during the emergency phase; however, there are no procedures included for relocating people or households that were not evacuated but that may be in contaminated areas. Provide information for relocating persons that were not evacuated but may be in contaminated areas.</p> <p>A.2 Appendix 11, <i>Decontamination, Re-Entry, Return and Recovery</i>, states the VDH dose levels for determining the need to relocate populations which is contrary to Federal guidance (EPA 400-R-92-001 states that the 50 year committed dose includes the first and second year whereas the stated dose in the COVRERP excludes the first and second years). Provide correct information on the dose levels for determining the need to relocate populations.</p> <p>A.3 Appendix 11, <i>Decontamination, Re-Entry, Return and Recovery</i>, states that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Services of the local jurisdiction affected. However, there are no decision-making procedures identified in any county plan that address allowing evacuated persons or households to permanently return to an evacuation area. Provide information addressing procedures for evacuated persons to permanently return to an evacuated area.</p> <p>A.4 The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 17 indicates that there are SOPs for post plume dose projection procedures. However, no VDH/DRH SOPs were supplied for review. The VDH/DRH ERP does not address the criteria for determining the permanent relocation of individuals evacuated during the plume phase of the event. It also does not address developing criteria for determining the need for relocating additional individuals who were not evacuated during the plume phase.</p>	<p>State: VA</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>Provide information on the criteria used for post plume relocation for both permanently relocated individuals and additional individuals not previously evacuated.</p> <p>B. Louisa County The Louisa County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, <i>Decontamination, Re-Entry, Return and Recovery</i>, which states that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Services of the local jurisdiction affected.</p> <p>C. Caroline County The Caroline County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, <i>Decontamination, Re-Entry, Return and Recovery</i>, which states that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Services of the local jurisdiction affected.</p> <p>D. Hanover County The Hanover County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, <i>Decontamination, Re-Entry, Return and Recovery</i>, which states that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Services of the local jurisdiction affected.</p> <p>E. Orange County The Orange County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, <i>Decontamination, Re-Entry, Return and Recovery</i>, which states that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Services of the local jurisdiction affected.</p> <p>F. Spotsylvania County The Spotsylvania County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, <i>Decontamination, Re-Entry, Return and Recovery</i>, which states that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Services of the local jurisdiction affected.</p>	

RAI Number	RAI Description	RAI For
North Anna – 039	<p>Subject: Recovery Operations Notifications Basis: NUREG-0654 Evaluation Criterion M.3 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 6, <i>Accident Assessment</i>, states that offsite emergency operations will be coordinated from the Virginia EOC. The plan does not specify the means that will be used to keep all involved response organizations informed of the recovery phase activities or changes that might take place in the organizational structure. Provide information specifying the means that will be used to keep all involved response organizations informed of the recovery phase activities or changes that might take place in the organizational structure.</p>	State: VA County: (None)
North Anna – 040	<p>Subject: Total Population Exposure Basis: NUREG-0654 Evaluation Criterion M.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 4, <i>Emergency Response</i>, indicates that the VDH/DRH will continue offsite monitoring, assessment, and environmental sampling until terminated by the Radiological Assessment Officer or when missions have been completed. Attachment 1, Section E, <i>Recovery/Relocation/Re-entry</i>, states that VDH/DRH will also maintain contact and coordinate the activities of Federal agency assistance. However, there is no information estimating the total population exposure from all pathways caused by the accident. Appendix 17 indicates that there is an SOP for post plume dose projection. This SOP was not provided for review. Provide information detailing the method used to estimate the total population exposure from all pathways as a result of the accident.</p>	State: VA County: (None)
North Anna – 041	<p>Subject: Communications Drills Basis: NUREG-0654 Evaluation Criterion N.2.a SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. The Commonwealth of Virginia A.1. The Commonwealth of Virginia RERP, Appendix 13, <i>Training and Exercise</i>, states that communication between the nuclear facility, the state and local governments within the plume exposure pathway EPZ will be tested daily. This is different that the local plans (which state that the tests will be conducted</p>	State: VA County: L/C/H/O/S

RAI Number	RAI Description	RAI For
	<p>monthly). Provide information on which is the appropriate frequency of communications drills.</p> <p>A.2. The Commonwealth of Virginia RERP does not specify a mechanism to ensure that the content of the message is understood. Provide a mechanism to ensure that the content of the message is understood during communications drills.</p> <p>B. Louisa County</p> <p>B.1. The Louisa County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that monthly drills will check the systems used for communications between State and local governments which is different than the daily drills specified in the Commonwealth of Virginia RERP. Provide information on which is the appropriate frequency of communications drills.</p> <p>B.2. The Louisa County RERP does not specify a mechanism to ensure that the content of the message is understood. Provide a mechanism to ensure that the content of the message is understood during communications drills.</p> <p>C. Caroline County</p> <p>C.1. The Caroline County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that monthly drills will check the systems used for communications between State and local governments which is different than the daily drills specified in the Commonwealth of Virginia RERP. Provide information on which is the appropriate frequency of communications drills.</p> <p>C.2. The Caroline County RERP does not specify a mechanism to ensure that the content of the message is understood. Provide a mechanism to ensure that the content of the message is understood during communications drills.</p> <p>D. Hanover County</p> <p>D.1 The Hanover County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that monthly drills will check the systems used for communications between State and local governments which is different than the daily drills specified in the Commonwealth of Virginia RERP. Provide information on which is the appropriate frequency of communications drills.</p> <p>D.2 The Hanover County RERP does not specify a mechanism to ensure that the content of the message is understood. Provide a mechanism to ensure that the content of the message is understood during communications drills.</p>	

RAI Number	RAI Description	RAI For
	<p>E. Orange County</p> <p>E.1. The Orange County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that monthly drills will check the systems used for communications between State and local governments which is different than the daily drills specified in the Commonwealth of Virginia RERP. Provide information on which is the appropriate frequency of communications drills.</p> <p>E.2. The Orange County RERP does not specify a mechanism to ensure that the content of the message is understood. Provide a mechanism to ensure that the content of the message is understood during communications drills.</p>	
	<p>F. Spotsylvania County</p> <p>F.1 The Spotsylvania County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that monthly drills will check the systems used for communications between State and local governments which is different than the daily drills specified in the Commonwealth of Virginia RERP. Provide information on which is the appropriate frequency of communications drills.</p> <p>F.2 The Spotsylvania County RERP does not specify a mechanism to ensure that the content of the message is understood. Provide a mechanism to ensure that the content of the message is understood during communications drills.</p>	
<p>North Anna – 042</p>	<p>Subject: Local Jurisdiction Participation in Medical Emergency Drills</p> <p>Basis: NUREG-0654 Evaluation Criterion N.2.c</p> <p>SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County</p> <p>The Louisa County RERP does not including information on the conduct of medical emergency drills and participation of local emergency response organizations for transport of contaminated injured individuals (members of the public, not licensee employees). Provide information about the participation of Louisa County medical transport providers in the annual medical emergency drills.</p> <p>B. Caroline County</p> <p>The Caroline County RERP does not including information on the conduct of medical emergency drills and participation of local emergency response organizations for transport of contaminated injured individuals (members of the public, not licensee employees). Provide information about the participation of Caroline County medical transport providers in the annual medical emergency drills.</p>	<p>State: (None)</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>C. Hanover County The Hanover County RERP does not including information on the conduct of medical emergency drills and participation of local emergency response organizations for transport of contaminated injured individuals (members of the public, not licensee employees). Provide information about the participation of Hanover County medical transport providers in the annual medical emergency drills.</p> <p>D. Orange County The Orange County RERP does not including information on the conduct of medical emergency drills and participation of local emergency response organizations for transport of contaminated injured individuals (members of the public, not licensee employees). Provide information about the participation of Orange County medical transport providers in the annual medical emergency drills.</p> <p>E. Spotsylvania County The Spotsylvania County RERP does not including information on the conduct of medical emergency drills and participation of local emergency response organizations for transport of contaminated injured individuals (members of the public, not licensee employees). Provide information about the participation of Spotsylvania County medical transport providers in the annual medical emergency drills.</p>	
<p>North Anna – 043</p>	<p>Subject: Implementing Corrective Actions Identified at Drills and Exercises Basis: NUREG-0654 Evaluation Criterion N.5 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 13, <i>Training and Exercises</i>, states the recommended corrective actions from drills and exercises will be implemented; however, the details of this process are not given. Provide information on the management control that has been established to ensure corrective actions are implemented.</p> <p>B. Louisa County The Louisa County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that areas for improvement noted during exercises will be evaluated, and if appropriate, be corrected by additional training, and appropriate changes included in the next plan revision. There is not an established procedure for this process. Provide information on the management control that has been established to</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>ensure corrective actions are implemented.</p> <p>C. Caroline County The Caroline County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that areas for improvement noted during exercises will be evaluated, and if appropriate, be corrected by additional training, and appropriate changes included in the next plan revision. There is not an established procedure for this process. Provide information on the management control that has been established to ensure corrective actions are implemented.</p> <p>D. Hanover County The Hanover County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that areas for improvement noted during exercises will be evaluated, and if appropriate, be corrected by additional training, and appropriate changes included in the next plan revision. There is not an established procedure for this process. Provide information on the management control that has been established to ensure corrective actions are implemented.</p> <p>E. Orange County The Orange County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that areas for improvement noted during exercises will be evaluated, and if appropriate, be corrected by additional training, and appropriate changes included in the next plan revision. There is not an established procedure for this process. Provide information on the management control that has been established to ensure corrective actions are implemented.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that areas for improvement noted during exercises will be evaluated, and if appropriate, be corrected by additional training, and appropriate changes included in the next plan revision. There is not an established procedure for this process. Provide information on the management control that has been established to ensure corrective actions are implemented.</p>	

RAI Number	RAI Description	RAI For
<p>North Anna – 044</p>	<p>Subject: Training of Personnel Provided as Part of Mutual Aid Agreements Basis: NUREG-0654 Evaluation Criterion O.1.b SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 13, <i>Training and Exercises</i>, provides for training of all state and local emergency response personnel. There is no specific reference to current mutual aid agreements in the plan. Mutual aid partners (such as American Red Cross or the Hospitals) are not included in the list of personnel receiving training. Provide information on the training of personnel that are part of mutual aid agreements.</p> <p>B. Louisa County The Louisa County RERP, Section XII, <i>Training and Exercises</i>, does not include mutual aid partners in the list of personnel receiving training. Mutual aid partners are referenced throughout the RERP. Provide information on the training of personnel that are part of mutual aid agreements.</p> <p>C. Caroline County— The Caroline County RERP, Section XII, <i>Training, Drills, and Exercises</i>; does not include mutual aid partners in the list of personnel receiving training. Provide information on the training of personnel that are part of mutual aid agreements.</p> <p>D. Hanover County The Hanover County RERP, Section XII, <i>Training, Drills, and Exercises</i>, does not include mutual aid partners in the list of personnel receiving training. Provide information on the training of personnel that are part of mutual aid agreements.</p> <p>E. Orange County The Orange County RERP, Section XII, <i>Training, Drills, and Exercises</i>, does not include mutual aid partners in the list of personnel receiving training. Mutual aid partners are referenced throughout the RERP. Provide information on the training of personnel that are part of mutual aid agreements.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Section XII, <i>Training, Drills, and Exercises</i>, does not include mutual aid partners in the list of personnel receiving training. Provide information on the training of</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	personnel that are part of mutual aid agreements.	
North Anna – 045	<p>Subject: Specific Information About Instructing and Qualifying Personnel Who Will Implement the RERP Basis: NUREG-0654 Evaluation Criterion O.4 a, c, d, f, g, h, j SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Louisa County The Louisa County RERP, Section XII, <i>Training, Drills, and Exercise</i>, states that initial training and retraining will be offered to the Emergency Services Coordinator, the Louisa County Sheriff's Department, the Louisa Volunteer Fire Departments, the Louisa Volunteer Rescue Squads, and other emergency services related personnel (i.e., EOC support staff). Information is not provided on the scope of the training program. Provide specific information on the scope of the training program.</p> <p>B. Caroline County The Caroline County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that initial training and retraining will be offered to the Emergency Services Coordinator, the Caroline County Sheriff's Department, the Caroline County Volunteer Fire Department, the Caroline County Volunteer Rescue Squad, and other emergency services related personnel (i.e., EOC support staff). Information is not provided on the scope of the training program. Provide specific information on the scope of the training program.</p> <p>C. Hanover County The Hanover County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that initial training and retraining will be offered to the Emergency Services Coordinator, the Hanover County Sheriff's Department, the Hanover County Volunteer Fire Department, the Hanover County Volunteer Rescue Squad, and other emergency services related personnel (i.e., EOC support staff). Information is not provided on the scope of the training program. Provide specific information on the scope of the training program.</p> <p>D. Orange County The Orange County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that initial training and retraining will be offered to the Emergency Management Coordinator, the Orange County law enforcement agencies, the Orange County Fire and EMS agencies, and other emergency services related personnel (i.e., EOC support staff). Information is not provided on the scope of the training</p>	<p>State: (None)</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>program. Provide specific information on the scope of the training program.</p> <p>E. Spotsylvania County The Spotsylvania County RERP, Section XII, <i>Training, Drills, and Exercises</i>, states that initial training and retraining will be offered to the Emergency Services Coordinator, the Spotsylvania County Sheriff's Department, the Spotsylvania County Volunteer Fire Department, the Spotsylvania County Volunteer Rescue Squad, and other emergency services related personnel (i.e., EOC support staff). Information is not provided on the scope of the training program. Provide specific information on the scope of the training program.</p>	
<p>North Anna – 046</p>	<p>Subject: Training Requirement for Individuals Responsible for the Planning Effort Basis: NUREG-0654 Evaluation Criterion P.1 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 13, Section II.E.5, <i>Training and Exercises, Operational Concepts and Procedures, Training</i>, states that “Key planners will be sent to the Radiological Emergency Planning Course at the Emergency Management Institute.” Key planners within the State Agencies are not identified. Provide information about the key planners within the State Agencies that will be provided the appropriate training.</p> <p>B. Louisa County The Louisa County RERP, Section XII.A, <i>Training, Drills, and Exercises</i>; states that the county, in conjunction with the State, “will participate in and provide training to involved organizations and individuals” including the Emergency Services Coordinator; however, it does not state if this individual is considered a “key planner” and will receive the appropriate training for this position. Provide information on the identification of the “key planner” and what training that person will receive.</p> <p>C. Caroline County The Caroline County RERP, Section XII.A, <i>Training, Drills, and Exercises</i>, states that the county, in conjunction with the State, “will participate in and provide training to involved organizations and individuals” including the Emergency Services Coordinator; however, it does not state if this individual is considered a “key planner” and will receive the appropriate training for this position.</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>Provide information on the identification of the “key planner” and what training that person will receive.</p> <p>D. Hanover County The Hanover County RERP, Section XII.A, <i>Training, Drills, and Exercises</i>, states that the county, in conjunction with the State, “will participate in and provide training to involved organizations and individuals” including the Emergency Services Coordinator; however, it does not state if this individual is considered a “key planner” and will receive the appropriate training for this position. Provide information on the identification of the “key planner” and what training that person will receive.</p> <p>E. Orange County The Orange County RERP, Section XII.A, <i>Training, Drills, and Exercises</i>, states that the county, in conjunction with the State, “will participate in and provide training to involved organizations and individuals” including the Emergency Management Coordinator; however, it does not state if this individual is considered a “key planner” and will receive the appropriate training for this position. Provide information on the identification of the “key planner” and what training that person will receive.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Section XII.A, <i>Training, Drills, and Exercises</i>, states that the county, in conjunction with the State, “will participate in and provide training to involved organizations and individuals” including the Emergency Services Coordinator; however, it does not state if this individual is considered a “key planner” and will receive the appropriate training for this position. Provide information on the identification of the “key planner” and what training that person will receive.</p>	
<p>North Anna – 047</p>	<p>Subject: Annual Review of and Revision of Plans Including Changes Based on Identified Issues from Drills and Exercises Basis: NUREG-0654 Evaluation Criterion P.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Appendix 13, <i>Training and Exercises</i>, indicates that exercises, drills and training will be provided, in part, to assure adequacy and update of the plans and that lessons learned during the conduct or critique of the exercise will be incorporated into future revisions of State and local plans or</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>operational procedures. However, the "Record of Changes" located in the RERP before the Table of Contents does not include a summary of changes made to the plan or any indication that changes made were as a result of drills and exercises. Provide information on the method used to update plans based on drills and exercises.</p> <p>B. Louisa County The Louisa County RERP, Section VII.A, <i>Organization, Louisa County</i>, states that the county plan and procedures will be reviewed annually. Section XII, <i>Training, Drills, and Exercises</i>, and Appendix 8, <i>Public Health ESF Procedure</i>, says that any findings, areas recommended for corrective action, or improvement recommended by federal evaluators or other observers resulting from exercises will be considered and corrected by appropriate training, plan update, and/or demonstration in the next scheduled exercise. The RERP contains a "Record of Changes" table; however, the table is blank. There is no reference to the latest exercise report, nor is there a reference to issues and responses from previous drills and exercises. Provide information on how identified issues are incorporated into the update of the plans.</p> <p>C. Caroline County The Caroline County RERP, Section VII.A, <i>Organization, Caroline County</i>, states that the county plan and procedures will be reviewed annually. Section XII, <i>Training, Drills, and Exercises</i>, and Appendix 8, <i>ESF #8 – Public Health Procedure</i>, says that any findings, areas recommended for corrective action, or improvement recommended by federal evaluators or other observers resulting from exercises will be considered and corrected by appropriate training, plan update, and/or demonstration in the next scheduled exercise. The RERP contains a "Record of Changes" table; however, the table is blank. There is no reference to the latest exercise report, nor is there a reference to issues and responses from previous drills and exercises. Provide information on how identified issues are incorporated into the update of the plans.</p> <p>D. Hanover County The Hanover County RERP, Section VII.A, <i>Organization, Hanover County</i>, states that the county plan and procedures will be reviewed annually. Section XII, <i>Training, Drills, and Exercises</i>, and Appendix 8, <i>ESF #8 – Public Health Procedure</i>, says that any findings, areas recommended for corrective action, or improvement recommended by federal evaluators or other observers resulting from exercises will be considered and corrected by appropriate</p>	

RAI Number	RAI Description	RAI For
	<p>training, plan update, and/or demonstration in the next scheduled exercise. The RERP contains a "Record of Changes" table; however, the table is blank. There is no reference to the latest exercise report, nor is there a reference to issues and responses from previous drills and exercises. Provide information on how identified issues are incorporated into the update of the plans.</p> <p>E. Orange County The Orange County RERP, Section VII.A, <i>Organization, Orange County</i>, states that the county plan and procedures will be reviewed annually. Section XII; <i>Training, Drills, and Exercises</i>, and Appendix 8, <i>Public Health ESF Procedure</i>, says that any findings, areas recommended for corrective action, or improvement recommended by federal evaluators or other observers resulting from exercises will be considered and corrected by appropriate training, plan update, and/or demonstration in the next scheduled exercise. The RERP contains a "Record of Changes" table; however, the table is blank. There is no reference to the latest exercise report, nor is there a reference to issues and responses from previous drills and exercises. Provide information on how identified issues are incorporated into the update of the plans.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Section VII.A, <i>Organization, Spotsylvania County</i>, states that the county plan and procedures will be reviewed annually. Section XII, <i>Training, Drills, and Exercises</i>, and Appendix 8, <i>ESF #8 – Public Health Procedure</i>, says that any findings, areas recommended for corrective action, or improvement recommended by federal evaluators or other observers resulting from exercises will be considered and corrected by appropriate training, plan update, and/or demonstration in the next scheduled exercise. The RERP contains a "Record of Changes" table; however, the table is blank. There is no reference to the latest exercise report, nor is there a reference to issues and responses from previous drills and exercises. Provide information on how identified issues are incorporated into the update of the plans.</p>	
<p>North Anna – 048</p>	<p>Subject: Revisions of Plans Marked and Dated and Distributed Basis: NUREG-0654 Evaluation Criterion P.5 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia A.1. The Commonwealth of Virginia RERP, Section X.C.1, <i>Execution, Plan Maintenance and Training</i>, states that the</p>	<p>State: VA County: (None)</p>

RAI Number	RAI Description	RAI For
	<p>State Coordinator of Emergency Management is the individual responsible for maintaining, reviewing, updating, and certifying the Plan annually. The Plan does not have, nor does it reference, a provision for marking or having equivalent visual indications on revised pages to show where changes were made. The "Record of Changes" located in the RERP before the Table of Contents does not include a summary of changes made to the plan. The entire plan is dated with the last revision date of May 2007. A list of agencies or organizations that are to receive the plan is not included. Provide information on the method used to indicate plan changes and to whom they are distributed.</p> <p>A.2. The Virginia Department of Health/Division of Radiological Health ERP, Appendix 12, Section 1.0, <i>Training and Exercises, Purpose</i>, states that the VDH/DRH will ensure that their plan and procedures are updated annually. No additional details are provided concerning a list of organizations that are provided with the plan; an indication of the individual responsible for distributing the plan; or an indication as to how revisions will be visually indicated in the plan. The plan is dated August 27, 2007. Provide information on what agencies or organizations receive copies of the plan, which is responsible for distributing the plan, and how revisions will be visually indicated.</p>	
<p>North Anna – 049</p>	<p>Subject: Listing of Supporting Plans and Their Source Basis: NUREG-0654 Evaluation Criterion P.6 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Section I, <i>Authorities and References</i>, lists numerous State and Federal regulations, guidance documents, procedures as well as plans and other the COVRERP. The Plans listed in this section include the Commonwealth of Virginia Emergency Operations Plan, and the National Response Plan. Attachment 1, <i>Supporting Plans, Memoranda of Understanding, Standing Operating Procedures and Public Affairs Publications</i>, provides a list of supporting plans including local, municipal, private and Federal Radiological Emergency Preparedness Plans. There are 31 Plans listed in this section, the majority of which are municipal and county plans. There are no references to school district or hospital plans in this section or elsewhere in the COVRERP. Provide information on the school plans, hospital plans, and any other special facility plans.</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>B. Louisa County The Louisa County RERP, Section I, <i>Authorities and References</i>, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.</p> <p>C. Caroline County The Caroline County RERP, Section I, <i>Authorities and References</i>, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.</p> <p>D. Hanover County The Hanover County RERP, Section I, <i>Authorities and References</i>, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.</p> <p>E. Orange County The Orange County RERP, Section I, <i>Authorities and References</i>, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Section I, <i>Authorities and References</i>, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.</p>	
<p>North Anna – 050</p>	<p>Subject: Detailed Listing of Implementing Procedures and Sections of Plans Being Implemented Basis: NUREG-0654 Evaluation Criterion P.7 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia A.1. The Commonwealth of Virginia RERP, Table of Contents, contains a detailed listing of implementing procedures. The list does not include the section(s) of the plan to be implemented by each procedure. Provide information on which section(s) of the plan are implemented by the procedures. A.2. The Virginia Department of Health/Division of Radiological</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>Health ERP, Section 12.0, <i>Appendices</i>, indicates that Appendix 17 are the Standard Operating Procedures (these procedures were not provided for review). The list of procedures in Appendix 17 does not include the section(s) of the plan to be implemented by each procedure. Provide information on which section(s) of the plan are implemented by the procedures.</p> <p>B. Louisa County The Louisa County RERP, Table of Contents and Section XIV, <i>Appendices</i>, provide a listing of Appendices which contain implementing procedures identified by emergency support function. It is not a complete list since some procedures have references to additional procedures. The list does not include the section(s) of the plan to be implemented by each procedure. Provide information on which section(s) of the plan are implemented by the procedures.</p> <p>C. Caroline County The Caroline County RERP, Table of Contents and Section XIV, <i>Appendices</i>, provide a listing of Appendices which contain implementing procedures identified by emergency support function. It is not a complete list since some procedures have references to additional procedures. There are inconsistencies between the order of the actual procedures as laid out in the Appendices and the listing provided in Section XIV. The list does not include the section(s) of the plan to be implemented by each procedure. Provide information on which section(s) of the plan are implemented by the procedures.</p> <p>D. Hanover County The Hanover County RERP, Table of Contents and Section XIV, <i>Appendices</i>, provide a listing of Appendices which contain implementing procedures identified by emergency support function. It is not a complete list since some procedures have references to additional procedures. The list does not include the section(s) of the plan to be implemented by each procedure. Provide information on which section(s) of the plan are implemented by the procedures.</p> <p>E. Orange County The Orange County RERP, Table of Contents and Section XIV, <i>Appendices</i>, provide a listing of Appendices which contain implementing procedures identified by emergency support function. It is not a complete list since some procedures have references to additional procedures. The list does not include the section(s) of the plan to be implemented by each procedure. Provide information on which section(s) of the plan are implemented by the procedures.</p>	

RAI Number	RAI Description	RAI For
	<p>F. Spotsylvania County The Spotsylvania County RERP, Table of Contents and Section XIV, <i>Appendices</i>, provide a listing of Appendices which contain implementing procedures identified by emergency support function. It is not a complete list since some procedures have references to additional procedures. There are inconsistencies between the order of the actual procedures as laid out in the Appendices and the listing provided in Section XIV. The list does not include the section(s) of the plan to be implemented by each procedure. Provide information on which section(s) of the plan are implemented by the procedures.</p>	
<p>North Anna – 051</p>	<p>Subject: Table of Contents and NUREG-0654 Cross Reference Basis: NUREG-0654 Evaluation Criterion P.8 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia A.1. The Commonwealth of Virginia RERP contains both a Table of Contents and a NUREG-0654 Cross Reference. The Table of Contents is thorough and accurate. The NUREG-0654 Cross Reference has a reference for almost every applicable criterion; however, it does not provide specific reference information to enable easy location of information within the plan for some criteria (for example, A.1.d, A.2.b, and H.3 just reference “Basic Plan”). The NUREG-0654 Cross Reference is riddled with errors (see report by criterion). Provide an accurate, specific NUREG-0654 Cross Reference. A.2. The Virginia Department of Health/Division of Radiological Health ERP does not contain a Table of Contents. The NUREG-0654 Cross Reference is riddled with errors (see report by criterion).- Provide a Table of Contents and an accurate, specific NUREG-0654 Cross Reference.</p> <p>B. Louisa County The Louisa County RERP contains both a Table of Contents and a NUREG-0654 Cross Reference. The NUREG-0654 Cross Reference is riddled with errors (see report by criterion). Provide an accurate, specific NUREG-0654 Cross Reference.</p> <p>C. Caroline County The Caroline County RERP contains both a Table of Contents and a NUREG-0654 Cross Reference. The listing in the Table of Contents for “Attachments” and/or “Appendices” is different than the listings provided at the beginning of those sections in the plan.</p>	<p>State: VA</p> <p>County: L/C/H/ O/S</p>

RAI Number	RAI Description	RAI For
	<p>The NUREG-0654 Cross Reference is riddled with errors (see report by criterion). Provide an accurate Table of Contents and an accurate, specific NUREG-0654 Cross Reference.</p> <p>D. Hanover County The Hanover County RERP contains both a Table of Contents and a NUREG-0654 Cross Reference. The NUREG-0654 Cross Reference is riddled with errors (see report by criterion). Provide an accurate, specific NUREG-0654 Cross Reference.</p> <p>E. Orange County The Orange County RERP contains both a Table of Contents and a NUREG-0654 Cross Reference. The NUREG-0654 Cross Reference is riddled with errors (see report by criterion). Provide an accurate, specific NUREG-0654 Cross Reference.</p> <p>F. Spotsylvania County The Spotsylvania County RERP contains both a Table of Contents and a NUREG-0654 Cross Reference. The listing in the Table of Contents for "Attachments" and/or "Appendices" is different than the listings provided at the beginning of those sections in the plan. The NUREG-0654 Cross Reference is riddled with errors (see report by criterion). Provide an accurate Table of Contents and an accurate, specific NUREG-0654 Cross Reference.</p>	
<p>North Anna – 052</p>	<p>Subject: Updating of Telephone Numbers, Call-Down Lists, and Maps</p> <p>Basis: NUREG-0654 Evaluation Criterion P.10</p> <p>SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Commonwealth of Virginia The Commonwealth of Virginia RERP, Section IX.B, <i>Responsibilities, Attachment 1, Supporting Plans, Memoranda of Understanding, Standing Operating Procedures and Public Affairs Publications</i>, and Appendix 2, <i>Task Assignments</i>, indicate that State Agencies with radiological emergency responsibilities will update telephone numbers of key response personnel at least quarterly and provide the updates to the Virginia EOC staff. There is no mention of updating call-down lists or maps as required by Guidance Memorandum PR-1, <i>Policy on NUREG-0654/FEMA-REP-1 and 44 CFR 350 Periodic Requirements</i>, October 1, 1985. Provide information on the quarterly update of call-down lists and maps.</p>	<p>State: VA</p> <p>County: L/C/H/O/S</p>

RAI Number	RAI Description	RAI For
	<p>B. Louisa County The Louisa County RERP, Section X, <i>Responsibilities</i>, states that the Coordinator of Emergency Services is responsible for the quarterly update of the telephone numbers in the procedures. There is no mention of updating call-down lists or maps. Provide information on the quarterly update of call-down lists and maps.</p> <p>C. Caroline County The Caroline County RERP, Section X, <i>Responsibilities</i>, states that the Coordinator of Emergency Services is responsible for the quarterly update of the telephone numbers in the procedures. There is no mention of updating call-down lists or maps. Provide information on the quarterly update of call-down lists and maps.</p> <p>D. Hanover County The Hanover County RERP, Section X, <i>Responsibilities</i>, states that the Coordinator of Emergency Services is responsible for the quarterly update of the telephone numbers in the procedures. There is no mention of updating call-down lists or maps. Provide information on the quarterly update of call-down lists and maps.</p> <p>E. Orange County The Orange County RERP, Section X, <i>Responsibilities</i>, states that the Coordinator of Emergency Management is responsible for the quarterly update of the telephone numbers in the procedures. There is no mention of updating call-down lists or maps. Provide information on the quarterly update of call-down lists and maps.</p> <p>F. Spotsylvania County The Spotsylvania County RERP, Section X, <i>Responsibilities</i>, states that the Coordinator of Emergency Services is responsible for the quarterly update of the telephone numbers in the procedures. There is no mention of updating call-down lists or maps. Provide information on the quarterly update of call-down lists and maps.</p>	