

Bruce Musico

From: Dan Barss
Sent: Monday, August 25, 2008 10:07 AM
To: Bruce Musico
Cc: Kevin Williams
Subject: FW:
Attachments: north Anna RAI 8-22-08.doc; 08-22-08 Letter Grecheck RAI North Anna.pdf

Bruce,

For your action. FEMA's RAIs for North Anna. This needs to go into ADAMS.

Dan

From: Sheffield, Bonnie [mailto:Bonnie.Sheffield@dhs.gov]
Sent: Friday, August 22, 2008 5:12 PM
To: Dominion.Naps3ColaRAI@DOM.COM; Cc:; john.hayden@dom.com; Wanda.K.Marshall@dom.com
Cc: Kevin Williams; Dan Barss; Quinn, Vanessa; Fiore, Craig; Strother, Thomas; Yates, Nathaniel; Banks-Robinson, Lisa; Hammons, Darrell
Subject:

Mr. Grecheck

Attached hereto are the RAI's for North Anna (Site 3). If you have any questions, please call Darrell Hammons at (215) 931-5546, or myself (202) 212-2120 or Mr. Strother at (202) 212-2121. .

*Thank you,
Bonnie Sheffield*

Training & Emergency Management Specialist
Department of Homeland Security
Federal Emergency Management Agency
Preparedness Directorate
Technological Hazards Division
Radiological Emergency Preparedness Branch
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FEMA

August 22, 2008

Mr. Eugene S. Grecheck
Vice President-Nuclear Development
Dominion Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060

Ref: Request for Additional Information (RAI) for the North Anna Power Station

Dear Mr. Grecheck:

FEMA Region III submitted the Interim Finding (IFR) report for the North Anna Power Station to the Nuclear Regulatory Commission on August 22, 2008. As the result of the IFR, the enclosed list of RAI was created. This same list of RAI is being forward to the responsible State and local authorities.

If you have any questions please contact Mr. Darrel Hammond, FEMA Region III Office, at (215) 931-5546.

Sincerely,

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

Vanessa E. Quint
Chief

Radiological Emergency Preparedness Branch

Enclosure: As stated

cc: Darrel Hammond, FEMA Region III w/o enclosure

**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 State: VA County: L/C/H/ O/S
North Anna - 001	<p>Subject: Written Agreements</p> <p>Basis: NUREG-0654 Evaluation Criterion A.3 and C.4</p> <p>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>	

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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.

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.

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.

**North
Anna –
002**

**Subject: Capabilities and Availability of Radiological Laboratories
Basis: NUREG-0654 Evaluation Criterion C.3
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
(None)**

A. Commonwealth of Virginia

A.1 The Commonwealth of Virginia RERP, Appendix 2, Section I.C, *Task Assignments, Division of Consolidated Laboratory Services*, 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, *Public Health and Medical Services, Radiological Laboratories* list secondary laboratories at the Medical College of Virginia and the University of Virginia Medical Center. However, the capabilities and expected availability of the

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secondary laboratories are not specified. Provide information about the general capabilities and expected availability of the secondary laboratories to provide analysis services.

- A.3 The Virginia Department of Health/Division of Radiological Health ERP, Appendix 5, Section 2.2.3.3, *Accident Assessment*, 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.

**North
Anna –
003**

**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

**State:
(None)**

**County:
L/C/H/
O/S**

A. Louisa County

The Louisa County RERP, Appendix 1, *Emergency Management ESF Procedure*, and Appendix 5, *Emergency Communications ESF Procedure*, 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.

B. Caroline County

The Caroline County RERP, Appendix 2, *ESF #2 – Communications Procedure*, and Appendix 5, *ESF #5 – Emergency Management Procedure*, 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.

C. Hanover County

The Hanover County RERP, Appendix 2, *ESF #2 – Communications Procedure*, and Appendix 5, *ESF #5 – Emergency Management Procedure*, 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.

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- D. Orange County
The Orange County RERP, Appendix 1, *Emergency Management ESF Procedure*, and Appendix 5, *Emergency Communications ESF Procedure*, 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.
- E. Spotsylvania County
The Spotsylvania County RERP, Appendix 2, *ESF #2 – Communications Procedure*, and Appendix 5, *ESF #5 – Emergency Management Procedure*, 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.

**North
Anna –
004**

**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

**State:
(None)**

**County:
L/C/H/
O/S**

- A. Louisa County
- A.1 The Louisa County RERP, Appendix 8, *Public Health ESF Procedure*, 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, *Organization, Department of Mental Health and Mental Retardation*, 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.
- A.2 The Louisa County RERP, Section VII.A.4, *Organization, Department of Social Services*, states that the department will assist in managing the emergency needs of special needs individuals. Section VII.A.5, *Organization, Department of Mental Health and Mental Retardation*, 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

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information on the procedure to notify and provide information to the special needs population.

B. Caroline County

- B.1 The Caroline County RERP, Appendix 8, *ESF #8 – Public Health Procedure*, 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.
- B.2 The Caroline County RERP, Section VII.A.4, *Organization, Department of Social Services*, 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, *ESF #8 – Public Health Procedure* 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.

C. Hanover County

- C.1 The Hanover County RERP, Appendix 8, *ESF #8 – Public Health Procedure*, 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.
- C.2 The Hanover County RERP, Section VII.A.4, *Organization, Department of Social Services*, 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, *ESF #8 – Public Health Procedure* 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.

D. Orange County

- D.1 The Orange County RERP, Appendix 8, *Public Health ESF Procedure*, 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.

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Provide information on the identification of the special needs populations.

- D.2 The Orange County RERP, Section VII.A.5, *Organization, Department of Public Health*, 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.

E. Spotsylvania County

- E.1 The Spotsylvania County RERP, Appendix 8, *ESF #8 – Public Health Procedure*, 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, *Department of Mental Health and Mental Retardation*, 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.

- E.2 The Spotsylvania County RERP, Section VII.A.4, *Organization, Department of Social Services*, states that the department will identify and manage special needs individuals residing within the 10-mile EPZ. Section VII.A.5, *Department of Mental Health and Mental Retardation*, states that the department will maintain a list of mentally handicapped persons who would require assistance during a radiological emergency. Appendix 8, *ESF #8 – Public Health Procedure* 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.

**North
Anna –
005**

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

**State:
(None)**

**County:
L/C/H/
O/S**

A. Louisa County

The Louisa County RERP, Section VIII.D, *Concept of Operations*,

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Alerting, states that back-up route alerting will be performed if all or part of the siren system fails to function. Appendix 1, *Emergency Management ESF Procedure*, states that the sheriff's department is to perform route alerting in failed sirens areas and references the "North Anna Siren Manual." Appendix 4, *Law Enforcement ESF Procedure*, 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.

B. Caroline County

The Caroline 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, *ESF #5 – Emergency Management Procedure*, states that the sheriff's department is to perform route alerting in failed sirens areas. Appendix 13, *ESF #13 – Public Safety and Security Procedure*, 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.

C. Hanover County

The Hanover 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, *ESF #5 – Emergency Management Procedure*, states that the sheriff's department is to perform route alerting in failed sirens areas. Appendix 13, *ESF #13 – Public Safety and Security Procedure*, 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.

D. Orange County

The Orange 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. 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

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system fail.

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, *ESF #5 – Emergency Management Procedure*, states that the sheriff's department is to perform route alerting in failed sirens areas and references the "North Anna Siren Manual." Appendix 13, *ESF #13 – Public Safety and Security Procedure*, 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.

**North
Anna –
006**

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

**State:
VA**

**County:
(None)**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 8, *Potassium Iodide (KI) Administration*, 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.

**North
Anna –
007**

Subject: Coordinated Communication Link for Fixed and Mobile Medical Support Facilities
Basis: NUREG-0654 Evaluation Criterion F.2
SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 10, *Communications*, provides information on the communications links between ambulances, hospitals, mobile command vehicles, and the

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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.

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.

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.

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.

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.

F. Spotsylvania County

The Spotsylvania County RERP does not directly address communications with fixed and mobile medical support facilities.

RAI Number	RAI Description	RAI For
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</p> <p>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.</p> <p>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</p> <p>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 North Anna – 010	RAI Description	RAI For State: VA
	Subject: Coordinated Program to Familiarize News Media with Emergency Plans, Information Concerning Radiation, and Points of Contact	
	Basis: NUREG-0654 Evaluation Criterion G.5	County: (None)
	SRP ACCEPTANCE CRITERION: Requirement H	

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, *Direction and Control, Public Information, Non-Emergency Periods*, 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.

North Anna – 011	Subject: Notification and Activation of Evacuation Assembly Centers Personnel	State: (None)
	Basis: NUREG-0654 Evaluation Criterion H.4	
	SRP ACCEPTANCE CRITERION: Requirement H	County: L/C/H/ O/S

A. Louisa County

The Louisa County RERP, Appendix 1, *Emergency Management ESF Procedures*, states that upon opening an Evacuation Assembly Center (EAC), the EOC is to notify all appropriate persons and organizations. Appendix 3, *Mass Care ESF Procedures*, 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.

B. Caroline County

The Caroline County RERP, Appendix 5, *ESF #5 – Emergency Management Procedure*, states that upon opening an Evacuation Assembly Center (EAC), the EOC is to notify all appropriate persons and organizations. Appendix 6, Tab B, *Evacuation Assembly Center Operational Procedure*, lists the organizations that staff the EAC. The notification procedures are not specified. Provide notification and activation information for the EACs.

C. Hanover County

The Hanover County RERP, Appendix 5, *ESF #5 – Emergency Management Procedure*, states that upon opening an Evacuation

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RAI Description

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Assembly Center (EAC), the EOC is to notify all appropriate persons and organizations. Appendix 6, Tab B, *Evacuation Assembly Center Operational Procedure*, lists the organizations that staff the EAC. The notification procedures are not specified. Provide notification and activation information for the EAC.

D. Orange County

The Orange County RERP, Appendix 3, *Mass Care ESF Procedure*, 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.

E. Spotsylvania County

The Spotsylvania County RERP, Appendix 6, *ESF #6 – Mass Care Procedure*, 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.

**North
Anna –
012**

**Subject: Provisions to Inspect, Inventory, and Operationally Check
Emergency Equipment/Instruments**

Basis: NUREG-0654 Evaluation Criterion H.10

SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 7, Section III.A, *Radiological Exposure Control, Logistics, Equipment*, 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.

B. Louisa County

The Louisa County RERP, Section VII.A.1.f(5), *Organization, Louisa County, Department of Emergency Services*, 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.

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RAI Description

**RAI
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- C. Caroline County
The Caroline County RERP, Section VII.A.1.h(5), *Organization, Caroline County, Department of Fire and Rescue/Emergency Services*, 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.
- D. Hanover County
The Hanover County RERP, Section VII.A.1.h(5), *Organization, Hanover County, Department of Emergency Services*, 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.
- E. Orange County
The Orange County RERP, Section VII.A.1.f(4), *Organization, Orange County, Department of Emergency Management*, 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.
- F. Spotsylvania County
The Spotsylvania County RERP, Section VII.A.1.f(4), *Organization, Spotsylvania County, Office of Emergency Services*, 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.

**North
Anna –
013**

**Subject: Emergency Kit Information
Basis: NUREG-0654 Evaluation Criterion H.11
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

- A. Commonwealth of Virginia
The Commonwealth of Virginia RERP, Appendix 7, Tab E, *Radiological Exposure Control, Radiological Monitoring Equipment Issued to Local Governments*, 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

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emergency equipment.

B. Louisa County

The Louisa County RERP references Appendix 6, Attachment 1, *Hazardous Materials Procedure, Equipment Distribution Log* (blank) which allows entries for dosimetry issuance; Appendix 7, Section II, *Search and Rescue ESF Procedure, Discussion/Overview* which has no information about any kind of equipment; and Appendix 8, Attachment 2, *Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones*. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.

C. Caroline County

The Caroline County RERP references Appendix 6, Attachment 1, *ESF #6 – Mass Care Procedure*, 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, *ESF #7 – Resource Support Procedure* does not have a section II and references the "Logistics Support Annex" which was not provided for review. Appendix 8, Attachment 2, *ESF #8 – Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones*. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.

D. Hanover County

The Hanover County RERP references Appendix 6, Attachment 1, *ESF #6 – Mass Care Procedure*, 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, *ESF #7 – Resource Support Procedure* does not have a section II and references the "Logistics Support Annex" which was not provided for review. Appendix 8, Attachment 2, *ESF #8 – Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones*. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.

**RAI
Number**

RAI Description

**RAI
For**

E. Orange County
The Orange County RERP references Appendix 6, Attachment 1, *Hazardous Materials Procedure, Equipment Distribution Log* (blank) which allows entries for dosimetry issuance; Appendix 7, Section II, *Search and Rescue ESF Procedure, Discussion/Overview* which has no information about any kind of equipment; and Appendix 8, Attachment 2, *Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones*. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.

F. Spotsylvania County
The Spotsylvania County RERP references Appendix 6, Attachment 1, *ESF #6 – Mass Care Procedure*, 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, *ESF #7 – Resource Support Procedure* does not have a section II and references the "Logistics Support Annex" which was not provided for review. Appendix 8, Attachment 2, *ESF #8 – Public Health ESF Procedure, List of North Anna Power Station Evacuation Assembly Centers (EACs) and Protective Action Zones*. There is no information about protective equipment, communications equipment, radiological monitoring equipment, or emergency supplies. Provide information on emergency equipment.

North Anna – 014 **Subject: Field Monitoring Team Procedures**
Basis: NUREG-0654 Evaluation Criterion I.8
SRP ACCEPTANCE CRITERION: Requirement H

State:
VA

County:
(None)

A. Commonwealth of Virginia
The Virginia Department of Health/Division of Radiological ERP, Appendix 1, *Task Assignments*, 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.

**RAI
Number
North
Anna –
015**

RAI Description
Subject: Air Sampling Procedures
Basis: NUREG-0654 Evaluation Criterion I.9
SRP ACCEPTANCE CRITERION: Requirement H

**RAI
For
State:
VA**

**County:
(None)**

- A. Commonwealth of Virginia
The Commonwealth of Virginia RERP, Appendix 6, *Accident Assessment*, and Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 5, *Accident Assessment*, 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.

**North
Anna –
016**

Subject: Dose Assessment
Basis: NUREG-0654 Evaluation Criterion I.10
SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
(None)**

- A. Commonwealth of Virginia
The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 5, *Accident Assessment*, 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.

**North
Anna –
017**

Subject: Onsite Personnel Evacuation Assistance
Basis: NUREG-0654 Evaluation Criterion J.2
SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/S**

- A. Commonwealth of Virginia
A.1 The Commonwealth of Virginia RERP, Appendix 5 *Emergency Response*, 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

**RAI
Number**

RAI Description

**RAI
For**

not included in the plans. Provide information on the assistance that will be provided to NAPS during an onsite evacuation.

- 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.

B. Louisa County

- 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, *Routes to Assembly Areas*, 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.

- 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.

C. Spotsylvania County

- 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, *Routes to Assembly Areas*, 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.

- 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.

RAI
Number
North
Anna –
018

RAI Description
**Subject: Protective Action Basis and Capability to Implement
Basis: NUREG-0654 Evaluation Criterion J.9
SRP ACCEPTANCE CRITERION: Requirement H**

RAI
For
State:
VA/MD

County:
L/C/H/
O/S

A. Commonwealth of Virginia

- A.1 The Commonwealth of Virginia RERP, Section VII, *Organization*, 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.
- A.2 Appendix 7, Tab A, *Radiological Exposure Control, Protective Action Guides for the General Population*, 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.
- A.3 COVREMP, Attachment 1, *Supporting Plans, Memoranda of Understanding, Standing Operating Procedures, and Public Affairs Publications*, 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.
- A.4 The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Section 8.1.5, *Concept of Operations and Procedures*, 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, *Standing Operating Procedures*, 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

**RAI
Number**

RAI Description

**RAI
For**

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.

B. Louisa County

B.1 The Louisa County RERP Section VIII.F, *Exposure Limits*, 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.

B.2 The Louisa County RERP, Appendix 2, *Emergency Public Information ESF Procedure*, 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.

C. Caroline County

C.1 The Caroline County RERP, Section VIII.F, *Exposure Limits*, 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.

C.2 The Caroline County RERP, Appendix 15, *ESF #15 External Affairs Procedure*, 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.

D. Hanover County

D.1 The Hanover County RERP, Section VIII.F, *Exposure Limits*,

**RAI
Number**

RAI Description

**RAI
For**

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.

- D.2 The Hanover County RERP, Appendix 15, *ESF #15 External Affairs Procedure*, 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.

E. Orange County

- E.1 The Orange County RERP, Section VIII.F, *Exposure Limits*, 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.
- E.2 The Orange County RERP, Appendix 2, *Emergency Public Information ESF Procedure*, 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.

F. Spotsylvania County

- F.1 The Spotsylvania County RERP, Section VIII.F, *Exposure Limits*, 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.
- F.2 The Spotsylvania County RERP, Appendix 15, *ESF #15 External Affairs Procedure*, states that, at the SAE, the PIO is to consult with the Coordinator to determine if there has been a

**RAI
Number**

RAI Description

**RAI
For**

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.

- 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.

**North
Anna –
019**

Subject: Maps Displaying Information to Support Evacuation Planning

Basis: NUREG-0654 Evaluation Criterion J.10.a

SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

- A. The Commonwealth of Virginia
- A.1 The Commonwealth of Virginia RERP, Appendix 5, *Emergency Response*, 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.
- B. Louisa County
- B.1 The Louisa County RERP, Appendix 3, *Mass Care ESF Procedure*, 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

**RAI
Number**

RAI Description
identifying towns and special facilities.

**RAI
For**

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.

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.

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.

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.

**North
Anna –
020**

Subject: Population Distribution Maps
Basis: NUREG-0654 Evaluation Criterion J.10.b
SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

A.1 The Commonwealth of Virginia RERP, Appendix 5, Tab B, Attachment 4, *Emergency Response, Population at Risk and Protective Actions, NAPS Protective Action Zones and Routes*, 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,

**RAI
Number**

RAI Description

**RAI
For**

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.

- 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.

B. Louisa County RERP

- B.1 The Louisa County RERP, Attachment 3, *Protective Action Zones Map North Anna Power Station*, 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.

- 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.

C. Caroline County

- C.1 The Caroline County RERP, Attachment 3, *Protective Action Zones Map North Anna Power Station*, 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,

**RAI
Number**

RAI Description

**RAI
For**

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.

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.

D. Hanover County

D.1 The Hanover County RERP, Attachment 3, *Protective Action Zones Map North Anna Power Station*, 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.

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.

E. Orange County

E.1 The Orange County RERP, Attachment 3, *Protective Action Zones Map North Anna Power Station*, 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,

**RAI
Number**

RAI Description

**RAI
For**

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.

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.

F. Spotsylvania County

F.1 The Spotsylvania County RERP, Attachment 3, *Protective Action Zones Map North Anna Power Station*, 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.

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.

**North
Anna –
021**

**Subject: Mobility Impaired Considerations
Basis: NUREG-0654 Evaluation Criterion J.10.d
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
(None)**

A. Louisa County

The Louisa County RERP does not specify transportation resources

**County:
L/C/H/
O/S**

**RAI
Number**

RAI Description

**RAI
For**

(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.

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.

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.

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.

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.

**North
Anna –
022**

**Subject: Use of Radioprotective Drugs (KI)
Basis: NUREG-0654 Evaluation Criterion J.10.e
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 8, *Potassium*

**County:
L/C/H/
O/S**

**RAI
Number**

RAI Description

**RAI
For**

Iodide (KI) Administration, 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.

B. Louisa County

The Louisa County RERP, Appendix 8, *Public Health ESF Procedure*, 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.

C. Caroline County

The Caroline County RERP, Appendix 8, *ESF #8 – Public Health Procedure*, 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.

D. Hanover County

The Hanover County RERP, Appendix 8, *ESF #8 – Public Health Procedure*, 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.

E. Orange County

The Orange County RERP Appendix 8, *Public Health ESF Procedure*, 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.

F. Spotsylvania County

The Spotsylvania County RERP, Appendix 8, *ESF #8 – Public Health Procedure*, 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

**RAI
Number**

RAI Description

**RAI
For**

locations and storage condition requirements.

**North
Anna –
023**

**Subject: Administration of Radioprotective Drugs (KI)
Basis: NUREG-0654 Evaluation Criterion J.10.f
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

A.1 The Commonwealth of Virginia RERP, Appendix 8, *Potassium Iodide (KI) Administration*, 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.

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.

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.

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.

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.

**RAI
Number**

RAI Description

**RAI
For**

- 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.
- 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.

**North
Anna –
024**

**Subject: Means of Relocation
Basis: NUREG-0654 Evaluation Criterion J.10.g
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
(None)**

**County:
L/C/H/
O/S**

- A. Louisa County
The Louisa County RERP Basic Plan, Attachment 8, *Permanent Resident Population Data by County within NAPS 10-mile EPZ*, 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.
- B. Caroline County
The Caroline County RERP Basic Plan, Attachment 8, *Permanent Resident Population Data by County within NAPS 10-mile EPZ*, 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.
- C. Hanover County
The Hanover County RERP Basic Plan, Attachment 8, *Permanent Resident Population Data by County within NPS 10-mile EPZ*, is a

**RAI
Number**

RAI Description

**RAI
For**

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.

D. Orange County

The Orange County RERP Attachments 7, *Population by Sectors North Anna Power Station*, and 8, *Permanent Resident Population Data by County within NAPS 10-mile EPZ*, 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.

E. Spotsylvania County

The Spotsylvania County RERP Basic Plan, Attachment 8, *Permanent Resident Population Data by County within NAPS 10-mile EPZ*, 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.

**North
Anna –
025**

**Subject: Relocation Centers
Basis: NUREG-0654 Evaluation Criterion J.10.h
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Annex F, *ESF #6 – Mass Care, Housing, and Human Services*, lists the North Anna Power Station Evacuation Assembly Centers; Patrick Henry High School (located in Hanover County) is footnoted as a “host school for

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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.

B. Louisa County

Louisa County RERP, Section V.D, *Situation, Protection Against the Hazard*, 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.

C. Caroline County

The Caroline County RERP, Section V.D, *Situation, Protection Against the Hazard*, 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.

D. Hanover County

The Hanover County RERP, Section V.D, *Situation, Protection Against the Hazard*, 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.

E. Orange County

E.1 The Orange County RERP, Section V.D, *Situation, Protection Against the Hazard*, 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, *Mass Care ESF Procedure*, identifies the EAC for Orange County as Prospect Heights

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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.

E.3 Orange County RERP, Appendix 3, *Mass Care ESF Procedure*, 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.

F. Spotsylvania County

The Spotsylvania County RERP, Section V.D, *Situation, Protection Against the Hazard*, 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.

**North
Anna –
026**

**Subject: Evacuation Route Traffic Capacity
Basis: NUREG-0654 Evaluation Criterion J.10.i
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 5 *Emergency Response*, 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.

B. Louisa County

The Louisa County RERP, Attachment 11, *Evacuation Time Estimate for NAPS*, provides a brief summary of the outdated Evacuation time Estimate Study conducted by Innovative Emergency Management, 2001. Traffic capacity of the evacuation

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RAI Description

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For**

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.

C. Caroline County

The Caroline County RERP, Attachment 11, *Evacuation Time Estimate for NAPS*, 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.

D. Hanover County

The Hanover County RERP, Attachment 11, *Evacuation Time Estimate for NAPS*, 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.

E. Orange County

The Orange County RERP, Attachment 11, *Evacuation Time Estimate for NAPS*, 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

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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.

F. Spotsylvania County

The Spotsylvania County RERP, Attachment 11, *Evacuation Time Estimate for NAPS*, 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.

**North
Anna –
027**

**Subject: Evacuation Route Impediments
Basis: NUREG-0654 Evaluation Criterion J.10.k
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
(None)**

**County:
L/C/H/
O/S**

A. Louisa County

The Louisa County RERP, Appendix 4, *Law Enforcement ESF Procedure*, 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.

B. Caroline County

The Caroline County RERP, Appendix 13, *ESF #13 Public Safety and Security Procedure*, 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.

C. Hanover County

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RAI Description

**RAI
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The Hanover County RERP, Appendix 13, *ESF #13 Public Safety and Security Procedure*, 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.

D. Orange County

The Orange County RERP, Appendix 4, *Law Enforcement ESF Procedure*, 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.

E. Spotsylvania County

The Spotsylvania County RERP, Appendix 13, *ESF #13 Public Safety and Security Procedure*, 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.

**North
Anna –
028**

**Subject: Evacuation Route Time Estimates
Basis: NUREG-0654 Evaluation Criterion J.10.1
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 5, *Emergency Response*, 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.

B. Louisa County

The Louisa County RERP Attachment 11, *Evacuation Time*

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RAI Description

**RAI
For**

Estimate for NAPS, 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.

C. Caroline County

The Caroline County RERP Attachment 11, *Evacuation Time Estimate for NAPS*, 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.

D. Hanover County

The Hanover County RERP Attachment 11, *Evacuation Time Estimate for NAPS*, 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.

E. Orange County

The Orange County RERP Attachment 11, *Evacuation Time Estimate for NAPS*, 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

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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.

F. Spotsylvania County

The Spotsylvania County RERP Attachment 11, *Evacuation Time Estimate for NAPS*, 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.

**North
Anna –
029**

**Subject: Ingestion Pathway Protective Measures
Basis: NUREG-0654 Evaluation Criterion J.11
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA/MD**

**County:
(None)**

A. Commonwealth of Virginia

A.1 The Commonwealth of Virginia RERP, Appendix 2, Section I.A, *Task Assignments*, 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, *ESF #11 – Agriculture and Natural Resources*, 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, *Standing Operating*

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RAI Description

**RAI
For**

Procedures, 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.

- 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.

**North
Anna –
030**

**Subject: Evacuee Monitoring and Registration
Basis: NUREG-0654 Evaluation Criterion J.12
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
(None)**

**County:
L/C/H/
O/S**

A. Louisa County

The Louisa County RERP, Appendix 3, Tab B, Attachment 8, *Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52*, 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, *Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response*. Provide information showing the portal monitoring operability check complies with the standard.

B. Caroline County

The Caroline County RERP, Appendix 6, Tab B, Attachment 8, *ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52*, 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, *Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response*. Provide information showing the portal monitoring operability

**RAI
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RAI Description
check complies with the standard.

**RAI
For**

C. Hanover County

The Hanover County RERP, Appendix 6, Tab B, Attachment 8, *ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52*, 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, *Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response*. Provide information showing the portal monitoring operability check complies with the standard.

D. Orange County

The Orange County RERP, Appendix 3, Tab B, Attachment 8, *Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52*, 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, *Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response*. Provide information showing the portal monitoring operability check complies with the standard.

E. Spotsylvania County

The Spotsylvania County RERP, Appendix 6, Tab B, Attachment 8, *ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure, Portal Monitor Operating Instructions – Model 52*, 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, *Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response*. Provide information showing the portal monitoring operability check complies with the standard.

**RAI
Number
North
Anna –
031**

RAI Description
Subject: Emergency Worker Dose Control
Basis: NUREG-0654 Evaluation Criterion K.3.a
SRP ACCEPTANCE CRITERION: Requirement H

**RAI
For
State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

A.1 The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 6, *Radiological Exposure Control*, 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.

A.2 The Commonwealth of Virginia RERP, Tab B2 to Appendix 7, *Radiological Exposure Control*, 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.

B. Louisa County

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.

C. Caroline County

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)].

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For**

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.

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.

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.

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.

**North
Anna –
032**

**Subject: Emergency Worker Dose Authorization
Basis: NUREG-0654 Evaluation Criterion K.4
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 6, *Radiological Exposure Control*, 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

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RAI Description

**RAI
For**

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.

B. Louisa County

B.1 The Louisa County RERP Appendix 3, Tab A, Attachment 5, *Mass Care ESF Procedure, Bus Driver Procedure*, 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, *Radiological Officer Briefing Form for School Bus Drivers*, 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.

B.2 Louisa County RERP Appendix 6, Tab B, *Hazardous Materials ESF Procedure, Field Monitoring Team Procedure*, 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.

C. Caroline County

C.1 The Caroline County RERP Appendix 6, Tab A, Attachment 2, *ESF #6 – Mass Care Procedure, Bus Driver Procedure*, 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, *Radiological Officer Briefing Form for School Bus Drivers*, 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.

C.2 The Caroline County RERP Appendix 10, Tab B, *ESF #10 – Oil and Hazardous Materials ESF Procedure, Field Monitoring Team Procedure*, 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

**RAI
Number**

RAI Description
exceed exposure limits.

**RAI
For**

D. Hanover County

- D.1 Hanover County RERP Appendix 6, Tab A, Attachment 2, *ESF #6 – Mass Care Procedure, Bus Driver Procedure*, 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, *Radiological Officer Briefing Form for School Bus Drivers*, 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.
- D.2 Hanover County RERP Appendix 10, Tab B, *ESF #10 – Oil and Hazardous Materials Procedure, Field Monitoring Team Procedure*, 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.

E. Orange County

- E.1 The Orange County RERP Appendix 3, Tab A, Attachment 5, *Mass Care ESF Procedure, Bus Driver Procedure*, 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, *Radiological Officer Briefing Form for School Bus Drivers*, 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.
- E.2 Orange County RERP Appendix 6, Tab B, *Hazardous Materials ESF Procedure, Field Monitoring Team Procedure*, 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.

F. Spotsylvania County

- F.1 Spotsylvania County RERP Appendix 6, Tab A, Attachment 5, *ESF #6 – Mass Care Procedure, Bus Driver Procedure*, says the bus driver will read dosimetry every 30 minutes and record

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Number**

RAI Description

**RAI
For**

findings on Form REC-1 and report any changes to the radiological officer. Attachment 10, *Radiological Officer Briefing Form for School Bus Drivers*, 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.

- F.2 Spotsylvania County RERP Appendix 10, Tab B, *ESF #10 – Oil and Hazardous Materials Procedure, Field Monitoring Team Procedure*, 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.

**North
Anna –
033**

**Subject: Decontamination Action Levels
Basis: NUREG-0654 Evaluation Criterion K.5.a
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
(None)**

**County:
L/C/H/
O/S**

A. Louisa County

The Louisa County RERP Appendix 3, Tab B, *Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure*, 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.

B. Caroline County

The Caroline County RERP, Appendix 6, Tab B, *ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure*, 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.

C. Hanover County

The Hanover County RERP, Appendix 6, Tab B, *ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation*

**RAI
Number**

RAI Description

**RAI
For**

Procedure, 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.

D. Orange County

The Orange County RERP, Appendix 3, Tab B, *Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure*, 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.

E. Spotsylvania County

The Spotsylvania County RERP, Appendix 6, Tab B, *ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure*, 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.

**North
Anna –
034**

**Subject: Decontamination Material Control
Basis: NUREG-0654 Evaluation Criterion K.5.b
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
(None)**

**County:
L/C/H/
O/S**

A. Louisa County

The Louisa County RERP, Appendix 3, Tab B, *Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure*, details vehicle, equipment, and personnel monitoring.

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.

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.

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Number**

RAI Description

**RAI
For**

B. Caroline County

Caroline County RERP, Appendix 6, Tab B, *ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure*, details vehicle, equipment, and personnel monitoring.

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.

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.

C. Hanover County

Hanover County RERP, Appendix 6, Tab B, *ESF #6 – Mass Care Procedure, Evacuation Assembly Center Operation Procedure*, details vehicle, equipment, and personnel monitoring.

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.

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.

D. Orange County

The Orange County RERP, Appendix 3, Tab B, *Mass Care ESF Procedure, Evacuation Assembly Center Operation Procedure*, details vehicle, equipment, and personnel monitoring.

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.

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.

E. Spotsylvania County RERP, Appendix 6, Tab B, *ESF #6 – Mass*

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RAI Description

**RAI
For**

Care Procedure, Evacuation Assembly Center Operation

Procedure, details vehicle, equipment, and personnel monitoring.

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.

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.

**North
Anna –
035**

**Subject: Hospitals for Contaminated/Injured Patients
Basis: NUREG-0654 Evaluation Criterion L.1
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Annex H, *ESF #8, Public Health and Medical Services*, 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.

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.

C. Caroline County

The Caroline County RERP does not list the primary and back-up hospitals. Provide information identifying the primary and back-up

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RAI Description

**RAI
For**

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.

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.

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.

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.

**North
Anna –
036**

**Subject: Medical Services for Contaminated/Injured Patients
Basis: NUREG-0654 Evaluation Criterion L.3
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
(None)**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Annex H, *ESF #8, Public Health and Medical Services*, 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

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RAI Description

**RAI
For**

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.

**North
Anna –
037**

**Subject: Medical Transport of Contaminated/Injured Patients
Basis: NUREG-0654 Evaluation Criterion L.4
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
(None)**

**County:
L/C/H/
O/S**

A. Louisa County

The Louisa County RERP, Appendix 10, *Firefighting ESF Procedure*, 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.

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.

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.

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.

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Number**

RAI Description

**RAI
For**

- 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.

**North
Anna –
038**

Subject: Recovery and Reentry Procedures
Basis: NUREG-0654 Evaluation Criterion M.1
SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

- A. Commonwealth of Virginia
- A.1 The Commonwealth of Virginia RERP, Appendix 2, *Task Assignments*, 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.
- A.2 Appendix 11, *Decontamination, Re-Entry, Return and Recovery*, 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.
- A.3 Appendix 11, *Decontamination, Re-Entry, Return and Recovery*, 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.
- 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.

**RAI
Number**

RAI Description

**RAI
For**

Provide information on the criteria used for post plume relocation for both permanently relocated individuals and additional individuals not previously evacuated.

B. Louisa County

The Louisa County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, *Decontamination, Re-Entry, Return and Recovery*, 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.

C. Caroline County

The Caroline County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, *Decontamination, Re-Entry, Return and Recovery*, 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.

D. Hanover County

The Hanover County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, *Decontamination, Re-Entry, Return and Recovery*, 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.

E. Orange County

The Orange County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, *Decontamination, Re-Entry, Return and Recovery*, 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.

F. Spotsylvania County

The Spotsylvania County RERP does not include any information about reentry and return. Provide information consistent with the COVRERP Appendix 11, *Decontamination, Re-Entry, Return and Recovery*, 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.

RAI Number	RAI Description	RAI For State:
North Anna – 039	Subject: Recovery Operations Notifications Basis: NUREG-0654 Evaluation Criterion M.3 SRP ACCEPTANCE CRITERION: Requirement H	VA
	<p>A. Commonwealth of Virginia</p> <p>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>	County: (None)
North Anna – 040	Subject: Total Population Exposure Basis: NUREG-0654 Evaluation Criterion M.4 SRP ACCEPTANCE CRITERION: Requirement H	State: VA
	<p>A. Commonwealth of Virginia</p> <p>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>	County: (None)
North Anna – 041	Subject: Communications Drills Basis: NUREG-0654 Evaluation Criterion N.2.a SRP ACCEPTANCE CRITERION: Requirement H	State: VA
	<p>A. The Commonwealth of Virginia</p> <p>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>	County: L/C/H/ O/S

**RAI
Number**

RAI Description

**RAI
For**

monthly). Provide information on which is the appropriate frequency of communications drills.

- 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.

- B. Louisa County
 - B.1. The Louisa County RERP, Section XII, *Training, Drills, and Exercises*, 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.
 - 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.

- C. Caroline County
 - C.1. The Caroline County RERP, Section XII, *Training, Drills, and Exercises*, 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.
 - 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.

- D. Hanover County
 - D.1 The Hanover County RERP, Section XII, *Training, Drills, and Exercises*, 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.
 - 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.

**RAI
Number**

RAI Description

**RAI
For**

- E. Orange County
 - E.1. The Orange County RERP, Section XII, *Training, Drills, and Exercises*, 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.
 - 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.

- F. Spotsylvania County
 - F.1. The Spotsylvania County RERP, Section XII, *Training, Drills, and Exercises*, 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.
 - 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.

**North
Anna –
042**

Subject: Local Jurisdiction Participation in Medical Emergency Drills
Basis: NUREG-0654 Evaluation Criterion N.2.c
SRP ACCEPTANCE CRITERION: Requirement H

**State:
(None)**

**County:
L/C/H/
O/S**

- A. Louisa County

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.

- B. Caroline County

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.

**RAI
Number**

RAI Description

**RAI
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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.

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.

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.

North
Anna –
043

Subject: Implementing Corrective Actions Identified at Drills and Exercises

Basis: NUREG-0654 Evaluation Criterion N.5

SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 13, *Training and Exercises*, 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.

B. Louisa County

The Louisa County RERP, Section XII, *Training, Drills, and Exercises*, 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

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RAI Description
ensure corrective actions are implemented.

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For**

C. Caroline County

The Caroline County RERP, Section XII, *Training, Drills, and Exercises*, 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.

D. Hanover County

The Hanover County RERP, Section XII, *Training, Drills, and Exercises*, 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.

E. Orange County

The Orange County RERP, Section XII, *Training, Drills, and Exercises*, 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.

F. Spotsylvania County

The Spotsylvania County RERP, Section XII, *Training, Drills, and Exercises*, 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.

**RAI
Number
North
Anna –
044**

RAI Description

Subject: Training of Personnel Provided as Part of Mutual Aid Agreements

Basis: NUREG-0654 Evaluation Criterion O.1.b

SRP ACCEPTANCE CRITERION: Requirement H

**RAI
For
State:
VA**

**County:
L/C/H/
O/S**

- A. Commonwealth of Virginia
The Commonwealth of Virginia RERP, Appendix 13, *Training and Exercises*, 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.
- B. Louisa County
The Louisa County RERP, Section XII, *Training and Exercises*, 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.
- C. Caroline County
The Caroline County RERP, Section XII, *Training, Drills, and Exercises*, 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.
- D. Hanover County
The Hanover County RERP, Section XII, *Training, Drills, and Exercises*, 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.
- E. Orange County
The Orange County RERP, Section XII, *Training, Drills, and Exercises*, 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.
- F. Spotsylvania County
The Spotsylvania County RERP, Section XII, *Training, Drills, and Exercises*, does not include mutual aid partners in the list of personnel receiving training. Provide information on the training of

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RAI Description

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personnel that are part of mutual aid agreements.

**North
Anna –
045**

**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**

**State:
(None)**

**County:
L/C/H/
O/S**

A. Louisa County

The Louisa County RERP, Section XII, *Training, Drills, and Exercise*, 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.

B. Caroline County

The Caroline County RERP, Section XII, *Training, Drills, and Exercises*, 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.

C. Hanover County

The Hanover County RERP, Section XII, *Training, Drills, and Exercises*, 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.

D. Orange County

The Orange County RERP, Section XII, *Training, Drills, and Exercises*, 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

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RAI Description

**RAI
For**

program. Provide specific information on the scope of the training program.

E. Spotsylvania County

The Spotsylvania County RERP, Section XII, *Training, Drills, and Exercises*, 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.

**North
Anna –
046**

**Subject: Training Requirement for Individuals Responsible for the
Planning Effort**

Basis: NUREG-0654 Evaluation Criterion P.1

SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 13, Section II.E.5, *Training and Exercises, Operational Concepts and Procedures, Training*, 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.

B. Louisa County

The Louisa County RERP, Section XII.A, *Training, Drills, and Exercises*, 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.

C. Caroline County

The Caroline County RERP, Section XII.A, *Training, Drills, and Exercises*, 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.

**RAI
Number**

RAI Description

**RAI
For**

Provide information on the identification of the “key planner” and what training that person will receive.

D. Hanover County

The Hanover County RERP, Section XII.A, *Training, Drills, and Exercises*, 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.

E. Orange County

The Orange County RERP, Section XII.A, *Training, Drills, and Exercises*, 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.

F. Spotsylvania County

The Spotsylvania County RERP, Section XII.A, *Training, Drills, and Exercises*, 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.

**North
Anna –
047**

**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**

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Appendix 13, *Training and Exercises*, 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

**RAI
Number**

RAI Description

**RAI
For**

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.

B. Louisa County

The Louisa County RERP, Section VII.A, *Organization, Louisa County*, states that the county plan and procedures will be reviewed annually. Section XII, *Training, Drills, and Exercises*, and Appendix 8, *Public Health ESF Procedure*, 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.

C. Caroline County

The Caroline County RERP, Section VII.A, *Organization, Caroline County*, states that the county plan and procedures will be reviewed annually. Section XII, *Training, Drills, and Exercises*, and Appendix 8, *ESF #8 – Public Health Procedure*, 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.

D. Hanover County

The Hanover County RERP, Section VII.A, *Organization, Hanover County*, states that the county plan and procedures will be reviewed annually. Section XII, *Training, Drills, and Exercises*, and Appendix 8, *ESF #8 – Public Health Procedure*, 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

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Number**

RAI Description

**RAI
For**

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.

E. Orange County

The Orange County RERP, Section VII.A, *Organization, Orange County*, states that the county plan and procedures will be reviewed annually. Section XII, *Training, Drills, and Exercises*, and Appendix 8, *Public Health ESF Procedure*, 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.

F. Spotsylvania County

The Spotsylvania County RERP, Section VII.A, *Organization, Spotsylvania County*, states that the county plan and procedures will be reviewed annually. Section XII, *Training, Drills, and Exercises*, and Appendix 8, *ESF #8 – Public Health Procedure*, 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.

**North
Anna –
048**

**Subject: Revisions of Plans Marked and Dated and Distributed
Basis: NUREG-0654 Evaluation Criterion P.5
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
(None)**

A. Commonwealth of Virginia

A.1. The Commonwealth of Virginia RERP, Section X.C.1, *Execution, Plan Maintenance and Training*, states that the

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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.

- A.2. The Virginia Department of Health/Division of Radiological Health ERP, Appendix 12, Section 1.0, *Training and Exercises, Purpose*, 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.

**North
Anna –
049**

**Subject: Listing of Supporting Plans and Their Source
Basis: NUREG-0654 Evaluation Criterion P.6
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

- A. Commonwealth of Virginia
The Commonwealth of Virginia RERP, Section I, *Authorities and References*, 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, *Supporting Plans, Memoranda of Understanding, Standing Operating Procedures and Public Affairs Publications*, 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.

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- B. Louisa County
The Louisa County RERP, Section I, *Authorities and References*, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.
- C. Caroline County
The Caroline County RERP, Section I, *Authorities and References*, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.
- D. Hanover County
The Hanover County RERP, Section I, *Authorities and References*, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.
- E. Orange County
The Orange County RERP, Section I, *Authorities and References*, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.
- F. Spotsylvania County
The Spotsylvania County RERP, Section I, *Authorities and References*, lists State, Federal and private plans and other supporting documents; however, there is not a listing of the school or other special facility plans.

**North
Anna –
050**

Subject: Detailed Listing of Implementing Procedures and Sections of Plans Being Implemented
Basis: NUREG-0654 Evaluation Criterion P.7
SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

- 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

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For**

Health ERP, Section 12.0, *Appendices*, 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.

B. Louisa County

The Louisa County RERP, Table of Contents and Section XIV, *Appendices*, 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.

C. Caroline County

The Caroline County RERP, Table of Contents and Section XIV, *Appendices*, 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.

D. Hanover County

The Hanover County RERP, Table of Contents and Section XIV, *Appendices*, 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.

E. Orange County

The Orange County RERP, Table of Contents and Section XIV, *Appendices*, 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.

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RAI Description

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F. Spotsylvania County

The Spotsylvania County RERP, Table of Contents and Section XIV, *Appendices*, 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.

**North
Anna –
051**

**Subject: Table of Contents and NUREG-0654 Cross Reference
Basis: NUREG-0654 Evaluation Criterion P.8
SRP ACCEPTANCE CRITERION: Requirement H**

**State:
VA**

**County:
L/C/H/
O/S**

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.

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.

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.

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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.

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.

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.

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.

**North
Anna –
052**

Subject: Updating of Telephone Numbers, Call-Down Lists, and Maps

Basis: NUREG-0654 Evaluation Criterion P.10

SRP ACCEPTANCE CRITERION: Requirement H

**State:
VA**

**County:
L/C/H/
O/S**

A. Commonwealth of Virginia

The Commonwealth of Virginia RERP, Section IX.B, *Responsibilities*, Attachment 1, *Supporting Plans, Memoranda of Understanding, Standing Operating Procedures and Public Affairs Publications*, and Appendix 2, *Task Assignments*, 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, *Policy on NUREG-0654/FEMA-REP-1 and 44 CFR 350 Periodic Requirements*, October 1, 1985. Provide information on the quarterly update of call-down lists and maps.

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- B. Louisa County
The Louisa County RERP, Section X, *Responsibilities*, 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.
- C. Caroline County
The Caroline County RERP, Section X, *Responsibilities*, 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.
- D. Hanover County
The Hanover County RERP, Section X, *Responsibilities*, 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.
- E. Orange County
The Orange County RERP, Section X, *Responsibilities*, 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.
- F. Spotsylvania County
The Spotsylvania County RERP, Section X, *Responsibilities*, 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.