

September 11, 2008

Mr. David A. Christian
President and Chief Nuclear Officer
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: KEWAUNEE POWER STATION, MILLSTONE POWER STATION, UNITS 2 AND 3, NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2, SURRY POWER STATION, UNIT NOS. 1 AND 2 – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION RE: THE USE OF WEIGHTING FACTORS FOR EXTERNAL EXPOSURE (TAC NOS. MD9472, MD9473, MD9474, MD9475, MD9476, MD9477, AND MD9478)

Dear Mr. Christian:

By letter dated August 18, 2008, Dominion Energy Kewaunee, Inc. (DEK), Dominion Nuclear Connecticut, Inc. (DNC), and Virginia Electric and Power Company (Dominion), submitted a request for Kewaunee Power Station, Millstone Power Station, Units 2 and 3, and North Anna and Surry Power Stations, Unit Nos. 1 and 2. The proposed request would allow the use of weighting factors for calculating external whole body dose. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Section 20.1003 of Title 10 of the *Code of Federal Regulations* (10 CFR) states, for the purpose of weighting the external whole body dose (for adding it to the internal dose), a single weighting factor, $W_t = 1.0$, has been specified. The use of other weighting factors for external exposure will be approved on a case-by-case basis until such time as specific guidance is issued. Section 20.1201(c) of 10 CFR addresses the technical information of how individual dose is determined.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed request in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that DEK, DNC and Dominion, supplement the application to address the information requested in the enclosure by September 24, 2008. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC staff will

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cease its review actions associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Geoff Wertz of your staff on September 9, 2008.

If you have any questions, please contact the Project Manager, Donna Wright, at (301) 415-1864.

Sincerely,

/RA LOlshan for/

John Stang, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-305, 50-336/423, 50-338/339, and
50-280/281

Enclosure:
As stated

cc w/encl: See next page

D. Christian

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John Stang, Senior Project Manager
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Enclosure:
As stated

cc w/encl: See next page

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NAME	DWright	JStang	MOBrien	TKobetz	MWong
DATE	9 / 11 /2008	9 / 11 /2008	9 / 11 /2008	9 / 11 /2008	9 / 11 /2008

OFFICIAL RECORD COPY

Kewaunee Power Station, Millstone Power Station, Units 2 and 3, North Anna Power Station, Unit Nos. 1 and 2, and Surry Power Station, Unit Nos. 1 & 2

cc:

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Kewaunee Power Station, Millstone Power Station, Units 2 and 3, North Anna Power Station, Unit Nos. 1 and 2, and Surry Power Station, Unit Nos. 1 & 2

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SUPPLEMENTAL INFORMATION NEEDED

LICENSING ACTION REQUEST PER 10 CFR PART 20

DOMINION ENERGY KEWAUNEE, INC., DOMINION NUCLEAR CONNECTICUT, INC.

VIRGINIA ELECTRIC AND POWER COMPANY

KEWAUNEE POWER STATION, MILLSTONE POWER STATION, UNITS 2 AND 3

NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2

SURRY POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-305, 50-336/423, 50-338/339, AND 50-280/281

1. Section 2.4 "DOSIMETER SELECTION AND PLACEMENT," in the Attachment to the August 18, 2008, request references the dosimeter placement criteria in INPO 05-008. This is not acceptable to the NRC staff since some of the criteria in INPO 05-008 are contrary to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 20, and could lead to the licensee being in violation of Part 20. Reasonable dosimeter placement criteria can be found in NRC Inspection Procedure 83724, Section 02.04. Please address this issue.
2. Section 2.6 "CONCLUSION," is written in a way that endorses the entire HPS N13.41 standard. HPS N13.41 has not been endorsed by the NRC staff. The dosimetry placement criteria as described in the standard are not sufficiently clear to ensure a conservative result. In addition, the discussion on when multi-badging is appropriate can be misinterpreted as providing criteria sufficient for meeting the requirements in 10 CFR 20.1201(c), which it does not. The previous licensing actions cited as precedents in the request have all been very clear that the licensee is only requesting approval of the use of the table of Compartment Factors and the methodology discussed in Section 6.2 of N13.41, as modified by the licensee's commitments. Please address this issue.

Enclosure