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October 24, 2008

Ms. Vanessa E. Quinn
Chief, Radiological Emergency Preparedness Branch
Federal Emergency Management Agency
U. S. Department of Homeland Security
500 C Street, SW
Washington, D. C. 20472

Serial No. NA3-08-107R
Docket No. 52-017
COL/JPH

DOMINION VIRGINIA POWER
NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION
RESPONSE TO FEMA REQUEST FOR ADDITIONAL INFORMATION

On August 22, 2008, a Request for Additional Information (RAI) for the North Anna Power Station was issued by your office. The RAI addressed offsite emergency planning activities. Accordingly, the enclosed responses have been prepared by the Commonwealth of Virginia's Department of Emergency Management (VDEM). No revision to the North Anna Combined Operating License Application is required as a result of these responses.

Please contact Regina Borsh at (804) 273-2247 (regina.borsh@dom.com) if you have questions.

Very truly yours,

Eugene S. Grecheck

Enclosure: Letter from Commonwealth of Virginia Department of Emergency Management, dated October 22, 2008.

DO89
NR0

Commitments made by this letter: None.

cc: U. S. Nuclear Regulatory Commission, Region II
NRC Document Control Desk
T. A. Kevern, NRC
J. T. Reece, NRC
D. Hammond, FEMA Region III
M. M. Cline, VDEM
J. L. Clements, VDEM
B. A. Burdick, VDEM
A. Warren, VDEM
G. Urquhart, VDEM
J. J. Deblec, ODEC
G. A. Zinke, NuStart/Entergy
T. L. Williamson, Entergy
R. Kingston, GEH
K. Ainger, Exelon
P. Smith, DTE

ENCLOSURE

Letter from Commonwealth of Virginia Department of Emergency Management

Response to FEMA RAI

October 22, 2008



COMMONWEALTH of VIRGINIA

Department of Emergency Management

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October 22, 2008

Eugene S. Grecheck
Vice President-Nuclear Development
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Innsbrook Technical Center
5000 Dominion Boulevard
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Dear Mr. Grecheck:

On August 22, 2008, the Federal Emergency Management Agency (FEMA) Radiological Emergency Preparedness (REP) Branch Chief issued a letter to the Nuclear Regulatory Commission (NRC), subject: Interim Finding Report for the North Anna Power Station Combined License (COL) Application. This letter provided results from the FEMA Region III REP Program staff review of offsite radiological emergency response plans provided in the COL application. FEMA found that the current plans are sufficient to protect the health and safety of the public, and that there is reasonable assurance the appropriate protective measures can and will be applied offsite in the event of a radiological emergency.

In another letter, also dated August 22, 2008, subject: Request for Additional Information (RAI) for the North Anna Power Station, the FEMA REP Branch Chief provided Dominion a list of RAIs related to the COL application. These RAIs concern matters under the cognizance of the Commonwealth of Virginia and the communities around the North Anna site. We have developed responses addressing each RAI and providing them in the attachment to this letter. It is understood that Dominion will forward this information to the FEMA REP Branch Chief from which FEMA will prepare a statement of reasonable assurance for the COL application.

Thank you for your continuing partnership in these efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael M. Cline".

Michael M. Cline

Enclosure

"Working to Protect People, Property and Our Communities"

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Department of Emergency Management



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RAI North Anna – 001 A Commonwealth of Virginia

Subject: Written Agreements

Basis: NUREG-0654 Evaluation Criterion A.3 and C.4

SRP ACCEPTANCE CRITERION: Requirement H

The Commonwealth of Virginia RERP, Volume III, Basic Plan, Attachment 1, Supporting Plans, Memoranda of Understanding, Standing Operating Procedures and Public Affairs Publications, 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.

Response

Agreements will be identified and reevaluated.

Proposed Plan Change

A listing of agreements will be included as an attachment to the COVRERP no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 001 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.

Response

Agreements will be identified and reevaluated.

Proposed Plan Change

A listing of agreements will be included as an attachment to the Louisa County RERP no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 001 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.

Response

Agreements will be identified and reevaluated.

Proposed Plan Change

A listing of agreements will be included as an attachment to the Caroline County RERP no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 001 D Hanover County

The Hanover 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.

Response

Agreements will be identified and reevaluated.

Proposed Plan Change

A listing of agreements will be included as an attachment to the Hanover County RERP no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 001 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.

Response

Agreements will be identified and reevaluated.



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Proposed Plan Change

A listing of agreements will be included as an attachment to the Orange County RERP no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 001 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.

Response

Agreements will be identified and reevaluated.

Proposed Plan Change

A listing of agreements will be included as an attachment to the Spotsylvania County RERP no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 002 A.1 Commonwealth of Virginia

Subject: Capabilities and Availability of Radiological Laboratories

Basis: NUREG-0654 Evaluation Criterion C.3

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The Commonwealth of Virginia Department of General Services Division of Consolidated Laboratory Services (DCLS), also known as Virginia Commonwealth Laboratories, provides analytical testing services. DCLS may be called on to respond to various health and environmental emergencies in Virginia. Its Bureau of Analytical Services performs analytical testing for state regulatory, environmental, and public health programs. Laboratories are located in Richmond and Abingdon, Virginia. Water, sediment, tissue, air, soil, and other samples may be analyzed for the presence of metals and/or radiation by its Metals/Radiochemistry Group.



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Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 002 A.2 Commonwealth of Virginia

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

Response

The Virginia Commonwealth University Medical Center (historically known as the Medical College of Virginia) Office of Environmental Health & Safety (OEHS) Radiation Safety Office oversees the use of radioactive material and radiation-producing devices, conducts surveys for contamination and monitors radiation exposures.

The University of Virginia (UVA) Office of Environmental Health and Safety Radiation Safety Office manages all aspects of the use of radioactive materials and radiation producing equipment at UVA. The Radiation Safety Office controls and monitors radiation exposures to employees exposed to radiation during their work, calibrates radiation survey instruments and conducts radiation surveys.

Requisite law: § 32.1–102.2(C), *Code of Virginia*. These facilities shall meet and satisfy the regulations and requirements of the Commonwealth of Virginia.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 002 A.3 Commonwealth of Virginia

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.

Response

The Virginia Department of Health (VDH), Office of Epidemiology, Radiological Health Program, Mobile Incident Command/Radiation Laboratory provides mobile radiological laboratory services



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for a commercial nuclear power plant accident, analytical services for the environmental monitoring program, and serves as a Mobile Incident Command Vehicle. The Radiation Laboratory has detectors for gamma analysis and alpha/beta counting. Portable instrumentation includes Geiger-Müller survey meters with stick probes and pancake probes, alpha scintillation survey meters and probes, micro-R meters, radionuclide Identifiers with neutron detection capability, survey meters with extendable probes, and air samplers with tripods and external battery supply.

VDH has two vehicles that are capable of providing mobile radiation laboratory services and provide support to the state field monitoring teams. The laboratory services are limited to analysis of environmental samples. One vehicle designated as the Field Lab can support the plume phase of nuclear power plant release. The other vehicle is the Mobile Incident Command Laboratory and has equipment with detection limits adequate to respond to both plume and ingestion pathway phases of a nuclear power plant radiation release.

Both vehicles are continuously available to respond to any radiological incident and may be mobilized upon a declaration of an "Alert" notification. They are currently parked at a location within a mile of Interstate 95 in Chester, Virginia approximately equidistant to the two nuclear power stations in Virginia, North Anna and Surry. There are pre-designated staging areas for the mobile radiation laboratory and State field teams. For the North Anna Nuclear Power Station, the staging areas are at Louisa and Post Oak Virginia Department of Transportation facilities. Both facilities have shore power connections for either vehicle and two telephone lines for voice and fax transmissions.

The Field Laboratory is a 2004 Ford E450 Ambulance body with electrical generator. The laboratory equipment consists of:

- In situ High purity germanium detector for gamma analysis
- Alpha/beta solid state detector for alpha/beta counting

In addition the vehicle carries portable field monitoring equipment:

- GM survey instruments with stick and pancake probes for gamma/beta radiation
- Alpha probes
- microR meters
- sodium iodide probes
- air pumps with battery, tripod, charcoal or silver zeolite cartridges
- soil, vegetation and water sampling supplies
- personnel dosimetry
- KI tablets

The Mobile Incident Command Laboratory is a 2007 Pierce Enforcer. It has a conference room in the back, a communications center in the cab with radio, internet, satellite phone, and Direct TV.



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The laboratory equipment consists of:

- High purity germanium detector with 2,000 lb shield for gamma analysis
- Sodium Iodide detector in 250 lb shield for gamma analysis
- Alpha/beta solid state detector for low level environmental alpha/beta counting
- Liquid scintillation counting for tritium and other low energy beta emitters

In addition the vehicle carries portable field monitoring equipment:

- GM survey instruments with stick and pancake probes for gamma/beta radiation
- Alpha probes
- microR meters
- sodium iodide probes
- air pumps with battery, tripod, charcoal or silver zeolite cartridges
- soil, vegetation and water sampling supplies
- personnel dosimetry
- KI tablets

The capabilities and availability of the Commonwealth of Virginia Department of General Services Division of Consolidated Laboratory Services (DCLS) are described in the response to RAI 002 A.1.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 003 A Louisa County

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

The Louisa 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.

Response

Each risk jurisdiction maintains an Alert and Call Out Notification List for use during an emergency situation at North Anna Power Station. This list is maintained separately from the Radiological Emergency Response Plan (RERP) for confidentiality and due to the frequency of changes to the information. The Alert and Call Out Notification List is based on the Emergency Classification Levels (ECLs) and the actions required for each level.



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The Alert and Call Out Notification List(s) may be reviewed at the Virginia Department of Emergency Management Trade Court Facility. Subject to extent of play agreements, it is anticipated that these instructions may be evaluated during the integrated exercise prior to fuel load.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 003 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 003 A for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 003 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 003 A for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.



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RAI North Anna – 003 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 003 A for Louisa County.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 003 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 003 A for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 004 A.1 Louisa County

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

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



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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.

Response

Local social services agencies are tasked with the responsibility to identify and manage special needs individuals residing within the 10 mile EPZ and mental health agencies are tasked with the responsibility to maintain a list of mentally handicapped persons who would require assistance during a radiological emergency. Representatives of these agencies are present in the local EOC and work in coordination with the local emergency management coordinator and other decision making officials to ensure that the needs of these individuals are met in an emergency. The ability to address this population group at the local level is exercised and evaluated biennially.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 004 A.2 Louisa County

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

Response

The response to this RAI for Louisa County is the same as the response to RAI 004 A.1.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 004 B.1 Caroline County

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.



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Response

The response to this RAI for Caroline County is the same as the response to RAI 004 A.1 for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 004 B.2 Caroline County

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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 004 A.1 for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 004 C.1 Hanover County

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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 004 A.1 for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.



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RAI North Anna – 004 C.2 Hanover County

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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 004 A.1 for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 004 D.1 Orange County

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. Provide information on the identification of the special needs populations.

Response

The response to this RAI for Orange County is the same as the response to RAI 004 A.1 for Louisa County.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 004 D.2 Orange County

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.



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Response

The response to this RAI for Orange County is the same as the response to RAI 004 A.1 for Louisa County.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 004 E.1 Spotsylvania County

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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 004 A.1 for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 004 E.2 Spotsylvania County

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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 004 A.1 for Louisa County.



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Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 005 A Louisa County

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

The Louisa 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 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.

Response

The North Anna Power Station "Backup Route Alerting and Siren Manual" lists each siren by number, contains a map showing the area covered, and provides detailed instructions describing the route that the mobile alerting team is to follow.

The documents may be reviewed at the Virginia Department of Emergency Management Trade Court Facility. Subject to extent of play agreements, it is anticipated that these instructions may be evaluated during the integrated exercise prior to fuel load.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 005 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.



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Response

The response to this RAI for Caroline County is the same as the response to RAI 005 A for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 005 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 include 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 005 A for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 005 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 system fail.

Response

The response to this RAI for Orange County is the same as the response to RAI 005 A for Louisa County.

Proposed Plan Change

No changes to the Orange County RERP are proposed.



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RAI North Anna – 005 E Spotsylvania

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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 005 A for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 006A Commonwealth of Virginia

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

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.

Response

The COVRERP will contain pre-scripted news release messages for KI administration.

Proposed Plan Change

The KI pre-scripted messages for both the news release and EAS will be included in the COVRERP plan no later than 30 days prior to the 2009 Surry biennial exercise.



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RAI North Anna – 007 A Commonwealth of Virginia

Subject: Coordinated Communication Link for Fixed and Mobile Medical Support Facilities

Basis: NUREG-0654 Evaluation Criterion F.2

SRP ACCEPTANCE CRITERION: Requirement H

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

Response

The Virginia EOC has developed and maintains contact information for appropriate fixed medical support facilities in support of the North Anna Power Station and its risk jurisdictions. The primary fixed medical support facilities are VCU Medical Center (Richmond) and Mary Washington Hospital (Fredericksburg). These facilities may be contacted via telephonic means, by the VDH Emergency Communications Center (ECC), or other best available means. The VEOC may contact mobile medical support facilities via VDH VCC.

Mobile medical support facility is the same as a rescue squad.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 007 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.

Response

The response to this RAI for Louisa County is the same as the response to RAI 007 A for the Commonwealth of Virginia.



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Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 007 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 007 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 007 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 007 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 007 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 007 A for the Commonwealth of Virginia.



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Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 007 F Spotsylvania County

The Spotsylvania County RERP does not directly address communications with fixed and mobile medical support facilities. Provide information on the communications systems between the Spotsylvania County EOC and the fixed and mobile medical support facilities.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 007 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 008 A.1 Commonwealth of Virginia

Subject: Coordinated Periodic Dissemination of Public Information

Basis: NUREG-0654 Evaluation Criterion G.1

SRP ACCEPTANCE CRITERION: Requirement H

The Commonwealth of Virginia RERP, Appendix 9, Section II.A.1, Public Information, Non-Emergency Periods, 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, Direction and Control, Public Information, Non-Emergency Periods; 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.

Response

The North Anna Power Station, 2008 Nuclear Emergency Planning Information Calendar is available through the NRC's Agencywide Documents Access and Management System (ADAMS) on the agency's web site, by entering accession number ML081210741 at this address: <http://www.nrc.gov/reading-rm/adams/web-based.html>.

Proposed Plan Change

No changes to the COVRERP are proposed.



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RAI North Anna – 008 A.2 Commonwealth of Virginia

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.

Response

In addition to the North Anna Power Station, 2008 Nuclear Emergency Planning Information Calendar referenced in the response to RAI 008 A.1 and the yellow pages advertisements described in RAI 009 A, a North Anna Power Station Emergency Public Information (brochure) for Residents and Visitors in the Communities of: Louisa / Spotsylvania / Orange / Caroline / Hanover Counties (Rev. 9/2007). This brochure is available by entering ADAMS Accession No. ML081210740 at this address: <http://www.nrc.gov/reading-rm/adams/web-based.html>.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 009 A Commonwealth of Virginia

Subject: Signs or Other Measures Used to Disseminate Information to Transient Populations

Basis: NUREG-0654 Evaluation Criterion G.2

SRP ACCEPTANCE CRITERION: Requirement H

The Commonwealth of Virginia RERP, Appendix 9, Section II.A.1, Public Information, Non-Emergency Periods, 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, Direction and Control, Public Information, Non-Emergency Periods. 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.

Response

The brochures are provided to local jurisdictions for further distribution to local public sites such as parks, post offices, restaurants and hotels.

Proposed Plan Change

No changes to the COVRERP are proposed.



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RAI North Anna – 010 A Commonwealth of Virginia

Subject: Coordinated Program to Familiarize News Media with Emergency Plans, Information Concerning Radiation, and Points of Contact

Basis: NUREG-0654 Evaluation Criterion G.5

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The strategy for providing briefings and information to the news media has evolved since the plan was originally issued. Currently, public information officers annually invite representatives of the news media to meetings in order to familiarize them with emergency plans, information concerning radiation, and provide points of contact. Records of these contacts are provided in the annual Letter of Certification.

Proposed Plan Change

The COVERP will be revised to clarify the means for acquainting news media with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 011 A Louisa County

Subject: Notification and Activation of Evacuation Assembly Centers Personnel

Basis: NUREG-0654 Evaluation Criterion H.4

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

When notified of an Alert at North Anna Power Station, a representative from social services, the school superintendent's office, and local health departments will respond to the local EOC



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and coordinate with the local emergency management coordinator to determine which EAC(s) are being opened. Mass care personnel with EAC assignments are notified at the Site Area Emergency to activate the appropriate EAC(s).

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 011 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 011 A for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 011 C Hanover County

The Hanover 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 EAC.

Response

The response to this RAI for Hanover County is the same as the response to RAI 011 A for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.



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RAI North Anna – 011 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 011 A for Louisa County.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 011 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 011 A for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 012 A Commonwealth of Virginia

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

Basis: NUREG-0654 Evaluation Criterion H.10

SRP ACCEPTANCE CRITERION: Requirement H

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.



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Response

The inventory and operational checks of equipment are completed and maintained by the State Radiological Protection Officer. This information is kept in a central database and is provided in the Annual Letter of Certification.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 012 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.

Response

The response to this RAI for Louisa County is the same as the response to RAI 012 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 012 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 012 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.



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RAI North Anna – 012 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 012 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 012 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 012 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 012 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 012 A for the Commonwealth of Virginia.



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Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 013 A Commonwealth of Virginia

Subject: Emergency Kit Information

Basis: NUREG-0654 Evaluation Criterion H.11

SRP ACCEPTANCE CRITERION: Requirement H

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 emergency equipment.

Response

The evaluation results are valid.

The 10-mile EPZ jurisdictions involved along with the facility have access to the Statewide Incident Response System (SIRS) which is an interoperable, interdisciplinary radio system located on 39.5 Mhz. The Commonwealth continues to look to upgrade its communications interoperability through implementation of the new Statewide Agency Radio System (STARS). Access to this system will be made available to all localities. See Commonwealth of Virginia 2008 Strategic Plan for Statewide Interoperable Communications Interoperability at <http://www.interoperability.virginia.gov/>

Proposed Plan Change

The COVRERP will be revised to include emergency kit information no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 013 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.



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Response

The evaluation results are valid.

Proposed Plan Change

The Louisa County RERP will be revised to include emergency kit information no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 013 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Caroline County RERP will be revised to include emergency kit information no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 013 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.



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Response

The evaluation results are valid.

Proposed Plan Change

The Hanover County RERP will be revised to include emergency kit information no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 013 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Orange County RERP will be revised to include emergency kit information no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 013 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.

Response

The evaluation results are valid.



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Proposed Plan Change

The Spotsylvania County RERP will be revised to include emergency kit information no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 014 A Commonwealth of Virginia

Subject: Field Monitoring Teams

Basis: NUREG-0654 Evaluation Criterion 1.8

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

VDH/DRH – ERP Appendix 3, Notification, addresses notification and activation processes and Appendix 6, Communications, addresses communications.

Appendix 17.1 Monitoring and Sample Team Procedures are the procedures for the field monitoring teams. Appendix 17.1 Section 1.0, Purpose as well as other sections describe composition of field teams. The Division of Radiological Health have access to four state-owned vehicles with radios installed for emergency response activities, not including the two mobile radiation laboratory vehicles. Estimated time to deploy to either staging area (Louisa VDOT and Post Oak VDOT) is approximately 1½-2 hours during business hours and 2-3 hours after hours.

The documents may be reviewed at the Virginia Department of Emergency Management Trade Court Facility. Subject to extent of play agreements, it is anticipated that these procedures may be evaluated during the integrated exercise prior to fuel load.

Proposed Plan Change

No changes to the VDH/DRH – ERP are proposed.



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RAI North Anna – 015 A Commonwealth of Virginia

Subject: Air Sampling Procedures

Basis: NUREG-0654 Evaluation Criterion I.9

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

There are two procedures, one addresses field analysis using portable survey instrument and the other addresses using laboratory analysis.

VDH/DRH – ERP Appendix 5 discusses operational capabilities to detect radioiodine in the presence of noble gases at levels of 10^{-7} uCi/cc through the use of air samplers with silver zeolite cartridges.

Appendix 17.4, LEOF procedures Section 5.3 shows the calculations from a survey instrument reading and Appendix 17.6, Staging Area, Attachment 10 is the Laboratory Sheet showing calculations for an air sample in the mobile lab.

These documents may be reviewed at the Virginia Department of Emergency Management Trade Court Facility. Subject to extent of play agreements, it is anticipated that these procedures may be evaluated during the integrated exercise prior to fuel load.

Proposed Plan Change

No changes to the VDH/DRH – ERP are proposed.

RAI North Anna – 016 A Commonwealth of Virginia

Subject: Dose Assessment

Basis: NUREG-0654 Evaluation Criterion I.10

SRP ACCEPTANCE CRITERION: Requirement H

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



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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.

Response

VDH/DRH – ERP, Appendix 5 Accident Assessment, Section 2.2 Operational Concepts and Procedures- Detection and Assessment addresses this responsibility.

Appendix 17.4, LEOF Section 4.0 describes the duties of the Assistant Radiological Assessment Officer (RAO). Among his duties includes the use of RASCAL, obtain source term data from the utility's Radiological Assessment Coordinator (RAC) and obtain data from the Field Team Coordinator. The Assistant RAO also compares the utility's atmospheric computer model, MIDAS, with the state's computer modeling software, RASCAL. RASCAL is a software program for atmospheric modeling the U.S. Nuclear Regulatory Commission provides to the states. RASCAL makes the comparison of integrated doses to the EPA PAGs.

Appendix 17.7, Offsite Dose Projection Computation Worksheet- is used whenever RASCAL is either not available or not working properly.

VDH bases its initial protective action recommendations on plant conditions. Staff responsible for accident assessment at the LEOF use field measurements as a basis for decision making for issuing KI to public and emergency workers.

Other field measurements or computer projections based on actual source term are used to confirm/verify initial protective actions were adequate to protect public health and safety.

The documents may be reviewed at the Virginia Department of Emergency Management Trade Court Facility. Subject to extent of play agreements, it is anticipated that these procedures may be evaluated during the integrated exercise prior to fuel load.

Proposed Plan Change

No changes to the VDH/DRH – ERP are proposed.

RAI North Anna – 017 A.1 Commonwealth of Virginia

Subject: Onsite Personnel Evacuation Assistance

Basis: NUREG-0654 Evaluation Criterion J.2

SRP ACCEPTANCE CRITERION: Requirement H

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 not included in the



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plans. Provide information on the assistance that will be provided to NAPS during an onsite evacuation.

Response

North Anna would notify local law enforcement prior to an evacuation of onsite personnel. Local law enforcement, state police, and VDOT may provide assistance during an onsite evacuation.

Proposed Plan Change

The COVERP will be revised to include this clarification no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 017 A.2 Commonwealth of Virginia

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.

Response

The remote assembly areas are identified in Figure II-4, Routes to Assembly Areas, of the COL Application.

Proposed Plan Change

The primary and secondary remote assembly areas locations and evacuation routes will be incorporated into the COVERP no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 017 B.1 Louisa County

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.



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Response

North Anna would notify local law enforcement prior to an evacuation of onsite personnel. Local law enforcement may provide assistance during an onsite evacuation. North Anna Power Station evacuees to the secondary remote assembly area travel through and remain in Louisa County.

Proposed Plan Change

The Louisa County RERP will be revised no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 017 B.2 Louisa County

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.

Response

The remote assembly areas are identified in Figure II-4, Routes to Assembly Areas, of the COL Application.

Proposed Plan Change

The primary and secondary remote assembly areas locations and evacuation routes will be incorporated into the Louisa County RERP no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 017 C.1 Spotsylvania County

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.

Response

The secondary remote assembly area is located in Louisa County.



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Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 017 C.2 Spotsylvania County

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.

Response

The primary and secondary remote assembly areas are located in Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 018 A.1 Commonwealth of Virginia

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

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.

Response

The evaluation results are valid. Upon notification of a General Emergency declaration and receipt of a protective action recommendation (PAR) from North Anna, the Commonwealth of Virginia implements its Virginia Emergency Operations Center (EOC) action checklist for developing and implementing PADs.

The Virginia Department of Health (VDH) provides a technical assessment of the utility's recommendation for a PAR to the Virginia EOC. VDH may consider other factors in modifying the PAR such as meteorological conditions (stability class, temperature extremes) or competing disasters that may affect an evacuation and impact special populations. VDH can conduct accident assessments from either the Emergency Operations Facility or the Virginia EOC.



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In the event, the Virginia EOC is not fully augmented at the time this notification is received, the Virginia EOC Duty Communications Officer will promptly notify the Virginia Department of Emergency Management (VDEM) Staff Duty Officer, convey the information and implement further actions as directed, including implementation of the Alert and Call Out Notification List. The VDEM Staff Duty Officer will coordinate with senior Commonwealth of Virginia decision-makers to determine protective actions for the public, including coordination with affected jurisdictions, activation of the Emergency Alert System (EAS), and deployment of field services.

Proposed Plan Change

COVRERP will be revised to describe the predetermined public PAD process for plant condition-based PARs no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 018 A.2 Commonwealth of Virginia

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.

Response

The Commonwealth of Virginia, Director of Emergency Management will direct the implementation of the protective actions and communicate them to the affected local governments and subdivisions.

Proposed Plan Change

The COVRERP will be revised to clarify the process of ingestion pathway decision making no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 018 A.3 Commonwealth of Virginia

COVRERP, 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.



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Response

The reference to the location of the local government ingestion pathway RERP plans in the COVRERP, Attachment 1 was incorrect. These plans are located in Appendix 4, Tab G.

Proposed Plan Change

The COVRERP, Attachment 1 will be revised to reflect the correct reference no later than 30 days prior to the 2009 Surry biennial exercise.

- The local government ingestion pathway RERP plans may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

RAI North Anna – 018 A.4 Commonwealth of Virginia

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 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.

Response

VDH/DRH ERP Appendix 17.8, Post Plume Dose Projection Procedure is the procedure for calculating the radiation dose or concentration levels that may require protective actions.

VDH/DRH ERP Appendix 17.9, Post Plume Pathway Package is the protective action package for the ingestion phase.

These procedures may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the VDH/DRH ERP are proposed.

RAI North Anna – 018 B.1 Louisa County

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



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prevention of ingestion exposure. Provide information on protective action guidelines for the ingestion pathway.

Response

The principal exposure would be from ingestion of contaminated water or foods such as milk or fresh vegetables. Early protective actions to minimize exposure or subsequent contamination of milk and other supplies would include area monitoring to detect contamination and putting cows on stored feed and protected source of water. This information can be found in the Louisa County Radiological Emergency Response Plan, Basic Plan, Sections V.C.2, V.D.5., and V.E.2., May 2008.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 018 B.2 Louisa County

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.

Response

The decision to update and expand protective actions to farmers and producers would be based on the situation and after consultation with VA Dept. of Health and VA Dept. of Agriculture and Consumer Services at the VEOC. This decision would then be relayed to the affected local governments for their dissemination via news release or other means available locally.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 018 C.1 Caroline County

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.



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Response

The principal exposure would be from ingestion of contaminated water or foods such as milk or fresh vegetables. Early protective actions to minimize exposure or subsequent contamination of milk and other supplies would include area monitoring to detect contamination and putting cows on stored feed and protected source of water. This information can be found in the Caroline County Radiological Emergency Response Plan, Basic Plan, Sections V.C.2, V.D.5., and V.E.2., May 2008.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 018 C.2 Caroline County

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.

Response

The decision to update and expand protective actions to farmers and producers would be based on the situation and after consultation with Virginia Department of Health and Virginia Department of Agriculture and Consumer Services at the Virginia Emergency Operations Center. This decision would then be relayed to the affected local governments for their dissemination via news release or other means available locally.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 018 D.1 Hanover County

The Hanover 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.



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Response

The principal exposure would be from ingestion of contaminated water or foods such as milk or fresh vegetables. Early protective actions to minimize exposure or subsequent contamination of milk and other supplies would include area monitoring to detect contamination and putting cows on stored feed and protected source of water. This information can be found in the Hanover County Radiological Emergency Response Plan, Basic Plan, Sections V.C.2, V.D.5., and V.E.2., May 2008.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 018 D.2 Hanover County

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.

Response

The decision to update and expand protective actions to farmers and producers would be based on the situation and after consultation with Virginia Department of Health and Virginia Department of Agriculture and Consumer Services at the Virginia Emergency Operations Center. This decision would then be relayed to the affected local governments for their dissemination via news release or other means available locally.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 018 E.1 Orange County

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.



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Response

The principal exposure would be from ingestion of contaminated water or foods such as milk or fresh vegetables. Early protective actions to minimize exposure or subsequent contamination of milk and other supplies would include area monitoring to detect contamination and putting cows on stored feed and protected source of water. This information can be found in the Orange County Radiological Emergency Response Plan, Basic Plan, Sections V.C.2, V.D.5., and V.E.2., May 2008.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 018 E.2 Orange County

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.

Response

The decision to update and expand protective actions to farmers and producers would be based on the situation and after consultation with Virginia Department of Health and Virginia Emergency Operations Center of Agriculture and Consumer Services at the Virginia Emergency Operations Center. This decision would then be relayed to the affected local governments for their dissemination via news release or other means available locally.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 018 F.1 Spotsylvania County

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.

Response

The principal exposure would be from ingestion of contaminated water or foods such as milk or fresh vegetables. Early protective actions to minimize exposure or subsequent contamination of



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milk and other supplies would include area monitoring to detect contamination and putting cows on stored feed and protected source of water. This information can be found in the Spotsylvania County Radiological Emergency Response Plan, Basic Plan, Sections V.C.2, V.D.5., and V.E.2., May 2008.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 018 F.2 Spotsylvania County

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 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.

Response

The decision to update and expand protective actions to farmers and producers would be based on the situation and after consultation with Virginia Emergency Operations Center of Health and Virginia Emergency Operations Center of Agriculture and Consumer Services at the Virginia Emergency Operations Center. This decision would then be relayed to the affected local governments for their dissemination via news release or other means available locally.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 018 G State of Maryland

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.

Response

In response to an NRC request, Dominion forwarded the Maryland Emergency Operations Plan – Emergency Response Plan ingestion pathway annex to the NRC Project Manager on 1/17/2008 [reference letter subject: State and Local Emergency Preparedness Plans, dated 1/28/2008].



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Proposed Plan Change

No changes to the State of Maryland RERP are proposed.

RAI North Anna – 019 A.1 Commonwealth of Virginia

Subject: Maps Displaying Information to Support Evacuation Planning

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

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The evaluation results are valid.

Proposed Plan Change

The COVRERP will be revised to include maps showing pre-selected radiological sampling and monitoring points (including points for sampling water supplies), and the locations of Evacuation Assembly Centers no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 019 A.2 Commonwealth of Virginia

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.

Response

The evaluation results are valid.

Proposed Plan Change

The COVRERP will be revised to include maps that clearly identify evacuation direction, roads, towns, and special facilities, as appropriate, no later than 30 days prior to the 2009 Surry biennial exercise.



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RAI North Anna – 019 B.1 Louisa County

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.

Response

The evaluation results are valid.

Proposed Plan Change

The Louisa County RERP will be revised to include legible emergency public bus route maps with road names no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 019 B.2 Louisa County

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 identifying towns and special facilities.

Response

The evaluation results are valid.

Proposed Plan Change

The Louisa County RERP will be revised to specify locations of Evacuation Assembly Centers and clearly identify towns and special facilities, as appropriate, no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 019 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.

Response

The evaluation results are valid.



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Proposed Plan Change

The Caroline County RERP will be revised to specify locations of Evacuation Assembly Centers and clearly identify towns and special facilities, as appropriate, no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 019 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Hanover County RERP will be revised to specify locations of Evacuation Assembly Centers and clearly identify towns and special facilities, as appropriate, no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 019 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Orange County RERP will be revised to specify locations of Evacuation Assembly Centers and clearly identify towns and special facilities, as appropriate, no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 019 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



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specifying the locations of Evacuation Assembly Centers and clearly identifying towns and special facilities.

Response

The evaluation results are valid.

Proposed Plan Change

The Spotsylvania County RERP will be revised to specify locations of Evacuation Assembly Centers and clearly identify towns and special facilities, as appropriate, no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 020 A.1 Commonwealth of Virginia

Subject: Population Distribution Maps

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

SRP ACCEPTANCE CRITERION: Requirement H

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, 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.

Response

There are no licensed day care centers, private schools, or special facilities (i.e. nursing homes) located within the 10-mile plume exposure emergency planning zone of North Anna.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 020 A.2 Commonwealth of Virginia

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



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information identifying the locations of recreation areas within the 10-mile EPZ with associated information on the maximum anticipated populations.

Response

Information identifying the locations of recreations areas within the 10-mile EPZ with information on the maximum anticipated populations is included in the 2008 KLD ETE (Rev. 1).

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 020 B.1 Louisa County

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.

Response

The response to this RAI for Louisa County is the same as the response to RAI 020 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 020 B.2 Louisa County

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.

Response

The response to this RAI for Louisa County is the same as the response to RAI 020 A.2 for the Commonwealth of Virginia.



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Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 020 C.1 Caroline County

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, 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 020 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 020 C.2 Caroline County

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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 020 A.2 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.



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RAI North Anna – 020 D.1 Hanover County

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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 020 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 020 D.2 Hanover County

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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 020 A.2 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 020 E.1 Orange County

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, organized by PAZ. There is also a table that details the public school populations within the NAPS 10 mile



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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.

Response

The response to this RAI for Orange County is the same as the response to RAI 020 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 020 E.2 Orange County

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.

Response

The response to this RAI for Orange County is the same as the response to RAI 020 A.2 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 020 F.1 Spotsylvania County

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.



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Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 020 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 020 F.2 Spotsylvania County

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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 020 A.2 for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 021 A Louisa County

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

The Louisa 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.

Response

Information on the types and quantities of transportation resources available to move the mobility impaired (transportation dependent) who have special needs is provided in the 2008 KLD ETE (Rev 1).

Proposed Plan Change

No changes to the Louisa County RERP are proposed.



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RAI North Anna – 021 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 021 A for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 021 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 021 A for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 021 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 021 A for Louisa County.



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Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 021 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 021 A for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 022 A Commonwealth of Virginia

Subject: Use of Radioprotective Drugs (KI)

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

SRP ACCEPTANCE CRITERION: Requirement H

The Commonwealth of Virginia RERP, Appendix 8, Potassium 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.

Response

Risk Jurisdiction	Health District	Quantity
Louisa County	Thomas Jefferson	3,498
Caroline County	Rappahannock	368
Hanover County	Hanover	45
Orange County	Rappahannock-Rapidan	77
Spotsylvania County	Rappahannock	1,577



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Potassium Iodide supplies are stored either in local Health Department offices or a warehouse for pharmaceuticals where the temperature will meet the storage temperature requirements of 68-77 degrees Fahrenheit.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 022 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.

Response

The response to this RAI for Louisa County is contained within the response to RAI 022 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 022 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.

Response

The response to this RAI for Caroline County is contained within the response to RAI 022 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 022 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



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conditions of KI. Provide information of specific quantities of KI at designated locations and storage condition requirements.

Response

The response to this RAI for Hanover County is contained within the response to RAI 022 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 022 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.

Response

The response to this RAI for Orange County is contained within the response to RAI 022 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 022 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 locations and storage condition requirements.

Response

The response to this RAI for Spotsylvania County is contained within the response to RAI 022 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.



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RAI North Anna – 023 A.1 Commonwealth of Virginia

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

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 COVERP, 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 COVERP.

Response

The COVERP will be revised to reflect the correct threshold of 5 rem Committed Dose Equivalent, Thyroid.

Proposed Plan Change

The COVERP will be revised no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 023 A.2 Commonwealth of Virginia

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.

Response

The VDH/DRH - ERP will be revised to reflect the correct threshold of 5 rem Committed Dose Equivalent, Thyroid.

Proposed Plan Change

The VDH/DRH - ERP will be revised no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 023 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.



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Response

The Louisa County RERP will be revised to reflect the correct threshold of 5 rem Committed Dose Equivalent, Thyroid.

Proposed Plan Change

The Louisa County RERP will be revised no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 023 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.

Response

The Caroline County RERP will be revised to reflect the correct threshold of 5 rem Committed Dose Equivalent, Thyroid.

Proposed Plan Change

The Caroline County RERP will be revised no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 023 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.

Response

The Hanover County RERP will be revised to reflect the correct threshold of 5 rem Committed Dose Equivalent, Thyroid.

Proposed Plan Change

The Hanover County RERP will be revised no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 023 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.

Response

The Orange County RERP will be revised to reflect the correct threshold of 5 rem Committed Dose Equivalent, Thyroid.

Proposed Plan Change

The Orange County RERP will be revised no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 023 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.

Response

The Spotsylvania County RERP will be revised to reflect the correct threshold of 5 rem Committed Dose Equivalent, Thyroid.

Proposed Plan Change

The Spotsylvania County RERP will be revised no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 024 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.



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Response

On November 27, 2007, Dominion submitted the current risk-jurisdiction RERPs (May 2006), and the ETE Report (Revision 0, October 2007) to the NRC with the COL Application. The ETE study was reviewed by the Commonwealth of Virginia and risk jurisdictions prior to its submittal.

Revision 1 of the ETE Report was submitted to the NRC by Dominion (reference letter, subject: Response to Request for Additional Information Letter No. 015, dated October 2, 2008, Serial No. NA3-08-080R). The COVRERP and the local RERPs will be modified to reference Revision 1 of the ETE Report as part of the next scheduled concurrent update of the plans which is no later than 30 days prior to the 2010 North Anna biennial exercise.

Proposed Plan Change

The Louisa County RERP will be modified as described in the KLD ETE Report (Rev 1) as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 024 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 024A for Louisa County.

Proposed Plan Change

The Caroline County RERP will be modified as described in the KLD ETE Report (Rev 1) as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 024 C Hanover County

The Hanover County RERP Basic Plan, Attachment 8, Permanent Resident Population Data by County within NPS 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



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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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 024 A for Louisa County.

Proposed Plan Change

The Hanover County RERP will be modified as described in the KLD ETE Report (Rev 1) as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 024 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 024 A for Louisa County.

Proposed Plan Change

The Orange County RERP will be modified as described in the KLD ETE Report (Rev 1) as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 024 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



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number of persons who may need assistance for each planning area and provide updated information on the permanent resident population data.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 024 A for Louisa County.

Proposed Plan Change

The Spotsylvania County RERP will be modified as described in the KLD ETE Report (Rev 1) as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 025 A Commonwealth of Virginia

Subject: Relocation Centers

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

SRP ACCEPTANCE CRITERION: Requirement H

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 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.

Response

Patrick Henry High School, located in Hanover County, is a host school and is an Evacuation Assembly Center for residents of Louisa County.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 025 B Louisa County

Louisa County RERP, Section V.D, Situation, Protection Against the Hazard, states that Louisa County has one Evacuation Assembly Center (EAC): Trevillian 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.



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Response

The address for Trevilian Elementary School is identified in the Louisa County School Plan. The capacity and accessibility for individuals with disabilities will be incorporated into the Louisa RERP.

Proposed Plan Change

The Louisa RERP will be revised to include Trevilian Elementary School address, capacity, and accessibility for individuals with disabilities no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 025 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.

Response

The addresses for Caroline County Middle School and Caroline County High School are identified in the Caroline County School Plan. The capacity and accessibility for individuals with disabilities will be incorporated into the Caroline RERP.

Proposed Plan Change

The Caroline RERP will be revised to include Caroline County Middle School and Caroline County High School addresses, capacities, and accessibility for individuals with disabilities no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 025 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.

Response

The addresses for Liberty Middle School and Patrick Henry High School are identified in the Hanover County School Plan. The capacity and accessibility for individuals with disabilities will be incorporated into the Hanover RERP.



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Proposed Plan Change

The Hanover RERP will be revised to include Liberty Middle School and Patrick Henry High School addresses, capacities, and accessibility for individuals no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 025 E.1 Orange County

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.

Response

The address for the Orange County EAC which is Prospect Height Middle School is identified in the Orange County School Plan. The Prospect Height Middle School's address, capacity, and accessibility for individuals with disabilities will be incorporated into the Orange RERP.

Proposed Plan Change

Section V.D of the Orange County RERP will be revised to include the Orange County EAC which is Prospect Height Middle School, its address, capacity, and accessibility for individuals with disabilities no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 025 E.2 Orange County

Orange County RERP, Appendix 3, Mass Care ESF Procedure, identifies the EAC for Orange County as Prospect Heights 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.

Response

Orange County has one Evacuation Assembly Center, Prospect Heights Middle School. Gordon-Barbour Elementary School is a host reception center for Louisa County. The information in the COVRERP is not consistent with the Orange County RERP. The COVRERP will be modified.



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Proposed Plan Change

The COVRERP will be modified as described above during the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 025 E.3 Orange County

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.

Response

The responsibility for the management for the Orange County EAC is vested in the Orange County Superintendent of Schools as described in the Orange County School plan.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 025 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.

Response

The addresses for Courtland High School, Chancellor High School, and Massaponax High School are identified in the Spotsylvania County School Plan. The capacity and accessibility for individuals with disabilities will be incorporated into the Spotsylvania RERP.

Proposed Plan Change

The Spotsylvania RERP will be revised to include Courtland High School, Chancellor High School, and Massaponax High School addresses, capacities, and accessibility for individuals with disabilities no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 026 A Commonwealth of Virginia

Subject: Evacuation Route Traffic Capacity
Basis: NUREG-0654 Evaluation Criterion J.10.1
SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

On November 27, 2007, Dominion submitted the current COVRERP (May 2007), the risk-jurisdiction RERPs (May 2006), and the ETE Report (Revision 0, October 2007) to the NRC with the COL Application. The ETE study was reviewed by the Commonwealth of Virginia and risk jurisdictions prior to its submittal.

Revision 1 of the ETE Report was submitted to the NRC by Dominion (reference letter, subject: Response to Request for Additional Information Letter No. 015, dated October 2, 2008, Serial No. NA3-08-080R). The COVRERP and the local RERPs will be modified to reference Revision 1 of the ETE Report as part of the next scheduled concurrent update of the plans which is 60 days prior to the 2010 North Anna biennial exercise.

Proposed Plan Change

The COVRERP will be modified as described above no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 026 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 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.



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Response

On November 27, 2007, Dominion submitted the risk-jurisdiction RERPs (May 2006) and the ETE Report (Revision 0, October 2007) to the NRC with the COL Application. The ETE study was reviewed by the Commonwealth of Virginia and risk jurisdictions prior to its submittal.

Revision 1 of the ETE Report was submitted to the NRC by Dominion (reference letter, subject: Response to Request for Additional Information Letter No. 015, dated October 2, 2008, Serial No. NA3-08-080R). The COVERP and the local RERPs will be modified to reference Revision 1 of the ETE Report as part of the next scheduled concurrent update of the plans which is 60 days prior to the 2010 North Anna biennial exercise.

Proposed Plan Change

The Louisa County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 026 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 026 B for Louisa County.

Proposed Plan Change

The Caroline County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 026 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



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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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 026 B for Louisa County.

Proposed Plan Change

The Hanover County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 026 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 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 026 B for Louisa County.

Proposed Plan Change

The Orange County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 026 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



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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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 026 B for Louisa County.

Proposed Plan Change

The Spotsylvania County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 027 A Louisa County

Subject: Evacuation Route Impediments

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

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The Commonwealth of Virginia is responsible for removal of impediments to evacuation routes and is coordinated through the Virginia Emergency Operations Center.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 027 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.



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Response

The response to this RAI for Caroline County is the same as the response to RAI 027 A for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 027 C Hanover County

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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 027 A for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 027 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 027 A for Louisa County.

Proposed Plan Change

No changes to the Orange County RERP are proposed.



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RAI North Anna – 027 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 027 A for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 028 A Commonwealth of Virginia

Subject: Evacuation Route Time Estimates

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

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

On November 27, 2007, Dominion submitted the current COVRERP (May 2007), the risk-jurisdiction RERPs (May 2006), and the ETE Report (Revision 0, October 2007) to the NRC with the COL Application. The ETE study was reviewed by the Commonwealth of Virginia and risk jurisdictions prior to its submittal.

Revision 1 of the ETE Report was submitted to the NRC by Dominion (reference letter, subject: Response to Request for Additional Information Letter No. 015, dated October 2, 2008, Serial No. NA3-08-080R).

The ETE Report concludes that the time to evacuate the special needs population lies within the evacuation time estimate identified in its Tables 7-1A through 7-1D.



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Proposed Plan Change

The COVERP will be modified to reference Revision 1 of the ETE Report as part of the next scheduled concurrent update of the COVERP and risk jurisdiction RERPs, which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 028 B Louisa County

The Louisa 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.

Response

The response to this RAI for Louisa County is the same as the response to RAI 028 A for the Commonwealth of Virginia.

Proposed Plan Change

The Louisa County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 028 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 028 A for the Commonwealth of Virginia.



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Proposed Plan Change

The Caroline County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 028 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 028 A for the Commonwealth of Virginia.

Proposed Plan Change

The Caroline County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 028 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 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 028 A for the Commonwealth of Virginia.



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Proposed Plan Change

The Orange County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 028 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 028 A for the Commonwealth of Virginia.

Proposed Plan Change

The Spotsylvania County RERP will be revised to include a reference to Revision 1 of the ETE Report as part of the next scheduled update of the plan which is no later than 30 days prior to the 2010 North Anna biennial exercise

RAI North Anna – 029 A.1 Commonwealth of Virginia

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

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 COVERP 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



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processing plants, watershed, water supply intake and treatment plants and reservoirs. Provide the information required by this criterion.

Response

The Virginia Department of Health is responsible for ingestion pathway protective measures as detailed in the response to RAI 029 A.2.

Maps showing general crop information, farms, dairies, food processing plants, watershed, water supply intake and treatment plants and reservoirs are available from the Department of Agricultural and Consumer Services.

Proposed Plan Change

COVERP, Appendix 2, Section I.I, Task Assignments, will be revised to expand upon the description of the Virginia Department of Health's responsibilities for ingestion pathway protective measures no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 029 A.2 Commonwealth of Virginia

The Virginia Department of Health/Division of Radiological Health (VDH/DRH) 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 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.

Response

VDH/DRH ERP, Appendix 17.8, Post Plume Dose Projection Procedure is the procedure for calculating the radiation dose or concentration levels that may require protective actions and Appendix 17.9, Post Plume Pathway Package is the protective action package for the ingestion phase.

The criteria for putting animals on stored feed is based on exceeding the EPA PAGs stated in Appendix 17.8 and is communicated via message #8 in Appendix 17.9.

VDH/DRH ERP, Appendix 10 defines contamination as greater than 0.1 mR/hr above background. Procedures for detecting contamination are described in Appendix 17.1-Monitoring and Sampling Team Procedure, which describes procedures for collecting various environmental media for analysis.



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The following documents are used for estimating the dose commitment consequences from the ingestion pathway and for imposing protective measures:

- Appendix 17.5, Initial Environmental Sampling Plan
- Appendix 17.8, Post Plume Dose Projection Procedure is the procedure for calculating the radiation dose or concentration levels that may require protective actions.
- Appendix 17.9, Post Plume Pathway Package is the protective action package for the ingestion phase.

Maps showing general crop information, farms, dairies, food processing plants, watershed, water supply intake and treatment plants and reservoirs are described in the response to RAI 029 A.1.

Proposed Plan Change

No changes to the VDH/DRH ERP are proposed.

RAI North Anna – 029 B State of Maryland

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.

Response

In response to an NRC request, Dominion forwarded the Maryland Emergency Operations Plan – Emergency Response Plan ingestion pathway annex to the NRC Project Manager on 1/17/2008 [reference letter subject: State and Local Emergency Preparedness Plans, dated 1/28/2008].

Proposed Plan Change

No changes to the State of Maryland RERP are proposed.

RAI North Anna – 030 A Louisa County

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

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



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for Emergency Response. Provide information showing the portal monitoring operability check complies with the standard.

Response

Portal Monitor Operating Instructions – Model 52 will be reviewed against FEMA-REP-21, Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response, and changes will be made as necessary.

Proposed Plan Change

The Louisa County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 030 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 check complies with the standard.

Response

Portal Monitor Operating Instructions – Model 52 will be reviewed against FEMA-REP-21, Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response, and changes will be made as necessary.

Proposed Plan Change

The Caroline County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 030 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



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for Emergency Response. Provide information showing the portal monitoring operability check complies with the standard.

Response

Portal Monitor Operating Instructions – Model 52 will be reviewed against FEMA-REP-21, Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response, and changes will be made as necessary.

Proposed Plan Change

The Hanover County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 030 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.

Response

Portal Monitor Operating Instructions – Model 52 will be reviewed against FEMA-REP-21, Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response, and changes will be made as necessary.

Proposed Plan Change

The Orange County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 030 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



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Monitor Used for Emergency Response. Provide information showing the portal monitoring operability check complies with the standard.

Response

Portal Monitor Operating Instructions – Model 52 will be reviewed against FEMA-REP-21, Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response, and changes will be made as necessary.

Proposed Plan Change

The Spotsylvania County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 031 A.1 Commonwealth of Virginia

Subject: Emergency Worker Dose Control

Basis: NUREG-0654 Evaluation Criterion K.3.a

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The evaluation results are valid.

Proposed Plan Change

The VDH/DRH ERP will be revised to eliminate the inconsistencies no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 031 A.2 Commonwealth of Virginia

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



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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.

Response

The evaluation results are valid.

Proposed Plan Change

The COVRERP will be modified to resolve these inconsistencies as part of the next scheduled update of the plan which is no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 031 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Louisa County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 031 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)]. 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 031 B for Louisa County.



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Proposed Plan Change

The Caroline County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 031 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 031 B for Louisa County.

Proposed Plan Change

The Hanover County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 031 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 031 B for Louisa County.

Proposed Plan Change

The Orange County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 031 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 031 B for Louisa County.

Proposed Plan Change

The Spotsylvania County RERP will be revised as necessary no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 032 A Commonwealth of Virginia

Subject: Emergency Worker Dose Authorization

Basis: NUREG-0654 Evaluation Criterion K.4

SRP ACCEPTANCE CRITERION: Requirement H

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 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.

Response

The evaluation results are valid.

Proposed Plan Change

The VDH/DRH ERP will be revised to eliminate the inconsistencies no later than 30 days prior to the 2009 Surry biennial exercise.



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RAI North Anna – 032 B.1 Louisa County

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.

Response

The evaluation results are valid.

Proposed Plan Change

The Louisa County RERP will be revised to include information for school bus drivers on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 032 B.2 Louisa County

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.

Response

In order to exceed voluntary exposure limits for lifesaving, the emergency worker must first acknowledge they understand the potential health effects. Individuals who have the authority to allow emergency workers to exceed the lifesaving level of 12.5 R are as follows:

- Director of Emergency Management
- Coordinator of Emergency Management
- Radiological Officer

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 032 C.1 Caroline County

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



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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.

Response

The evaluation results are valid.

Proposed Plan Change

The Caroline County RERP will be revised to include information for school bus drivers on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 032 C.2 Caroline County

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 exceed exposure limits.

Response

The response to this RAI for Caroline County is the same as the response to RAI 032 B.2 for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 032 D.1 Hanover County

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.

Response

The evaluation results are valid.



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Proposed Plan Change

The Hanover County RERP will be revised to include information for school bus drivers on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 032 D.2 Hanover County

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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 032 B.2 for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 032 E.1 Orange County

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.

Response

The evaluation results are valid.

Proposed Plan Change

The Orange County RERP will be revised to include information for school bus drivers on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 032 E.2 Orange County

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.

Response

The response to this RAI for Orange County is the same as the response to RAI 032 B.2 for Louisa County.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 032 F.1 Spotsylvania County

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 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Spotsylvania County RERP will be revised to include information for school bus drivers on exposure limits and the process for requesting and receiving authorization for voluntarily exceeding those limits no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 032 F.2 Spotsylvania County

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.



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Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 032 B.2 for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 033 A Louisa County

Subject: Decontamination Action Levels

Basis: NUREG-0654 Evaluation Criterion K.5.a

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

After the initial exterior vehicle monitoring is completed and as time permits, the radiological monitor will initiate interior vehicle monitoring. Priority is given to the monitoring and decontamination of the vehicle exterior and driver to ensure contamination control.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 033 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 033 A for Louisa County.



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Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 033 C Hanover County

The Hanover 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 033 A for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 033 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 033 A for Louisa County.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 033 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.



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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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 033 A for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 034 A.1 Louisa County

Subject: Decontamination Material Control

Basis: NUREG-0654 Evaluation Criterion K.5.b

SRP ACCEPTANCE CRITERION: Requirement H

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

Response

The tool drop drum or any other contaminated equipment will be stored at the Evacuation Assembly Center (EAC) in a secured and controlled area as designated by the EAC Manager.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 034 A.2 Louisa County

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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Response

There are provisions in field team member training describing the doffing of protective clothing prior to being monitored for contamination.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 034 B.1 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.

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.

Response

The tool drop drum or any other contaminated equipment will be stored at the Evacuation Assembly Center (EAC) in a secured and controlled area as designated by the EAC Manager.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 034 B.2 Caroline County

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.

Response

There are provisions in field team member training describing the doffing of protective clothing prior to being monitored for contamination.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.



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RAI North Anna – 034 C.1 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.

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.

Response

The tool drop drum or any other contaminated equipment will be stored at the Evacuation Assembly Center (EAC) in a secured and controlled area as designated by the EAC Manager.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 034 C.2 Hanover County

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.

Response

There are provisions in field team member training describing the doffing of protective clothing prior to being monitored for contamination.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 034 D.1 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.

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.



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Response

The tool drop drum or any other contaminated equipment will be stored at the Evacuation Assembly Center (EAC) in a secured and controlled area as designated by the EAC Manager.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 034 D.2 Orange County

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.

Response

There are provisions in field team member training describing the doffing of protective clothing prior to being monitored for contamination.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 034 E.1 Spotsylvania County

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

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.

Response

The tool drop drum or any other contaminated equipment will be stored at the Evacuation Assembly Center (EAC) in a secured and controlled area as designated by the EAC Manager.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.



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RAI North Anna – 034 E.2 Spotsylvania County

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.

Response

There are provisions in field team member training describing the doffing of protective clothing prior to being monitored for contamination.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 035 A Commonwealth of Virginia

Subject: Hospitals for Contaminated/Injured Patients

Basis: NUREG-0654 Evaluation Criterion L.1

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

Plans for the Medical College of Virginia (MCV) Hospital and Mary Washington Hospital may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 035 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



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have the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.

Response

The evaluation results are valid. Medical College of Virginia (MCV) Hospital and Mary Washington Hospital function as the primary and back-up hospitals and are adequately prepared to handle contaminated individuals.

Proposed Plan Change

The Louisa County RERP will be revised to include the primary and back-up hospitals no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 035 C Caroline County

The Caroline 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.

Response

The evaluation results are valid. Medical College of Virginia (MCV) Hospital and Mary Washington Hospital function as the primary and back-up hospitals and are adequately prepared to handle contaminated individuals.

Proposed Plan Change

The Caroline County RERP will be revised to include the primary and back-up hospitals no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 035 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.



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Response

The evaluation results are valid. Medical College of Virginia (MCV) Hospital and Mary Washington Hospital function as the primary and back-up hospitals and are adequately prepared to handle contaminated individuals.

Proposed Plan Change

The Hanover County RERP will be revised to include the primary and back-up hospitals no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 035 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.

Response

The evaluation results are valid. Medical College of Virginia (MCV) Hospital and Mary Washington Hospital function as the primary and back-up hospitals and are adequately prepared to handle contaminated individuals.

Proposed Plan Change

The Orange County RERP will be revised to include the primary and back-up hospitals no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 035 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.

Response

The evaluation results are valid. Medical College of Virginia (MCV) Hospital and Mary Washington Hospital function as the primary and back-up hospitals and are adequately prepared to handle contaminated individuals.



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Proposed Plan Change

The Spotsylvania County RERP will be revised to include the primary and back-up hospitals no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 036 A Commonwealth of Virginia

Subject: Medical Services for Contaminated/Injured Patients

Basis: NUREG-0654 Evaluation Criterion L.3

SRP ACCEPTANCE CRITERION: Requirement H

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 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.

Response

The evaluation results are valid.

Proposed Plan Change

The COVRERP will be revised to reflect those hospitals that are qualified to handle contaminated injured patients and have equipment to perform radiological response functions no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 037 A Louisa County

Subject: Medical Transport of Contaminated/Injured Patients

Basis: NUREG-0654 Evaluation Criterion L.4

SRP ACCEPTANCE CRITERION: Requirement H

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



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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.

Response

The Louisa County RERP correctly provides for rescue squad assistance. However, the evaluation results are valid in that the Louisa County RERP does not currently describe how rescue squad assistance would handle contaminated, injured individuals or how individuals would be monitored for contamination if the individual is a member of the public and not being transported from the NAPS site.

Proposed Plan Change

The Louisa County RERP will be revised to include how rescue squad assistance would handle contaminated, injured individuals or be monitored for contamination if the individual is a member of the public and not being transported from the North Anna site no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 037 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Caroline County RERP will be revised to include information about the transport of contaminated injured members of the public no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 037 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.

Response

The evaluation results are valid.



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Proposed Plan Change

The Hanover County RERP will be revised to include information about the transport of contaminated injured members of the public no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 037 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Orange County RERP will be revised to include information about the transport of contaminated injured members of the public no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 037 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Spotsylvania County RERP will be revised to include information about the transport of contaminated injured members of the public no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 038 A.1 Commonwealth of Virginia

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

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.

Response

The evaluation results are valid.

Proposed Plan Change

The COVRERP will be revised to include information for relocating persons that were not evacuated but may be in contaminated areas no later than 30 days prior to the Surry biennial exercise.

RAI North Anna – 038 A.2 Commonwealth of Virginia

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.

Response

The evaluation results are valid.

Proposed Plan Change

The COVRERP and the VDH/DRH ERP will be revised to correct information on the dose levels for determining the need to relocate populations no later than 30 days prior to the Surry biennial exercise.

RAI North Anna – 038 A.3 Commonwealth of Virginia

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



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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.

Response

The evaluation results are valid.

Proposed Plan Change

The COVRERP will be corrected to state that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Management (Governor) no later than 30 days prior to the Surry biennial exercise. Local plans will be revised to reflect this change as well.

RAI North Anna – 038 A.4 Commonwealth of Virginia

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

Response

Appendix 17.8, Post Plume Dose Projection Procedure is the procedure for calculating the radiation dose or concentration levels that may require protective actions.
Appendix 17.9, Post Plume Pathway Package is the protective action package for the ingestion phase.

The documents may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the VDH/DRH ERP are proposed.

RAI North Anna – 038 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



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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.

Response

The Louisa County Plan will be changed to be consistent with the COV RERP Appendix 11, to clarify that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Management (Governor).

Proposed Plan Change

The Louisa County RERP will reflect this change as described above no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 038 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.

Response

The Caroline County Plan will be changed to be consistent with the COV RERP Appendix 11, to clarify that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Management (Governor).

Proposed Plan Change

The Caroline County RERP will reflect this change as described above no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 038 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.

Response

The Hanover County Plan will be changed to be consistent with the COV RERP Appendix 11, to clarify that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Management (Governor).



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Proposed Plan Change

The Hanover County RERP will reflect this change as described above no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 038 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.

Response

The Orange County Plan will be changed to be consistent with the COV RERP Appendix 11, to clarify that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Management (Governor).

Proposed Plan Change

The Orange County RERP will reflect this change as described above no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 038 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.

Response

The Spotsylvania County Plan will be changed to be consistent with the COV RERP Appendix 11, to clarify that the decision to allow re-entry and return of evacuated individuals rests with the Director of Emergency Management (Governor).

Proposed Plan Change

The Spotsylvania County RERP will reflect this change as described above no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 039 A Commonwealth of Virginia

Subject: Recovery Operations Notifications

Basis: NUREG-0654 Evaluation Criterion M.3

SRP ACCEPTANCE CRITERION: Requirement H

The Commonwealth of Virginia RERP, Appendix 6, Accident Assessment, 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.

Response

The evaluation results are valid.

Proposed Plan Change

The COVERP will be revised to specify that instaphone (dedicated phone line that instantly connects all parties to share information), telephone, WebEOC, cell phone, VCIN (Virginia Criminal Information Network), and R.A.C.E.S. (Radio Amateur Civil Emergency Services) 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 no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 040 A Commonwealth of Virginia

Subject: Total Population Exposure

Basis: NUREG-0654 Evaluation Criterion M.4

SRP ACCEPTANCE CRITERION: Requirement H

The Virginia Department of Health/Division of Radiological Health (VDH/DRH) ERP, Appendix 4, Emergency Response, 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, Recovery/Relocation/Re-entry, 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.



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Response

VDH/DRH ERP, Appendix 17.8, Post Plume Dose Projection Procedure is the procedure for calculating the radiation dose or concentration levels that may require protective actions.

With respect to estimation of the total population exposure from all pathways as a result of the accident, VDH assumes calculated doses for areas within 10 mile EPZ could be assigned and would collaborate with other state agencies, such as VDEM to obtain population for those areas by sector and distance from reactor site, or perhaps by census tract. Their calculations would take credit for those evacuated from the evacuated sectors before the off site release.

Proposed Plan Change

No changes to the VDH/DRH ERP are proposed.

RAI North Anna – 041 A.1 Commonwealth of Virginia

Subject: Communications Drills

Basis: NUREG-0654 Evaluation Criterion N.2.a

SRP ACCEPTANCE CRITERION: Requirement H

The Commonwealth of Virginia RERP, Appendix 13, Training and Exercise, 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 monthly). Provide information on which is the appropriate frequency of communications drills.

Response

Daily is the correct frequency for performing communication drills. This test primarily consists of a roll call to each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The local plans will be revised to state that daily is the correct frequency for performing communication drills no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 041 A.2 Commonwealth of Virginia

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.



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Response

Message content is verified on an annual basis during drills and exercises with each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The plans will be revised to ensure the annual message content verification process is specified in the COVERP no later than 30 days prior to the Surry biennial exercise and in the local plans, no later than 30 days prior to the North Anna biennial exercise.

RAI North Anna – 041 B.1 Louisa County

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.

Response

Daily is the correct frequency for performing communication drills. This test primarily consists of a roll call to each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The Louisa County RERP will be revised to state that daily is the correct frequency for performing communication drills no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 041 B.2 Louisa County

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.

Response

Message content is verified on an annual basis during drills and exercises with each local government within the 10-mile plume exposure pathway emergency planning zone.



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Proposed Plan Change

The Louisa County RERP will be revised to ensure the annual message content verification process is specified in the plan no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 041 C.1 Caroline County

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.

Response

Daily is the correct frequency for performing communication drills. This test primarily consists of a roll call to each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The Caroline County RERP will be revised to state that daily is the correct frequency for performing communication drills no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 041 C.2 Caroline County

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.

Response

Message content is verified on an annual basis during drills and exercises with each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The Caroline County RERP will be revised to ensure the annual message content verification process is specified in the plan no later than 30 days prior to the North Anna 2010 biennial exercise.



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RAI North Anna – 041 D.1 Hanover County

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.

Response

Daily is the correct frequency for performing communication drills. This test primarily consists of a roll call to each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The Hanover County RERP will be revised to state that daily is the correct frequency for performing communication drills no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 041 D.2 Hanover County

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.

Response

Message content is verified on an annual basis during drills and exercises with each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The Hanover County RERP will be revised to ensure the annual message content verification process is specified in the plan no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 041 E.1 Orange County

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.



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Response

Daily is the correct frequency for performing communication drills. This test primarily consists of a roll call to each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The Orange County RERP will be revised to state that daily is the correct frequency for performing communication drills no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 041 E.2 Orange County

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.

Response

Message content is verified on an annual basis during drills and exercises with each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The Orange County RERP will be revised to ensure the annual message content verification process is specified in the plan no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 041 F.1 Spotsylvania County

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.

Response

Daily is the correct frequency for performing communication drills. This test primarily consists of a roll call to each local government within the 10-mile plume exposure pathway emergency planning zone.



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Proposed Plan Change

The Spotsylvania County RERP will be revised to state that daily is the correct frequency for performing communication drills no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 041 F.2 Spotsylvania County

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.

Response

Message content is verified on an annual basis during drills and exercises with each local government within the 10-mile plume exposure pathway emergency planning zone.

Proposed Plan Change

The Spotsylvania County RERP will be revised to ensure the annual message content verification process is specified in the plan no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 042 A Louisa County

Subject: Local Jurisdiction Participation in Medical Emergency Drills

Basis: NUREG-0654 Evaluation Criterion N.2.c

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The evaluation results are valid.

Proposed Plan Change

The Louisa County RERP will be revised to describe the participation of Louisa County medical transport providers in the annual medical emergency drills.



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RAI North Anna – 042 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Caroline County RERP will be revised to describe the participation of Caroline County medical transport providers in the annual medical emergency drills.

RAI North Anna – 042 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Hanover County RERP will be revised to describe the participation of Hanover County medical transport providers in the annual medical emergency drills.

RAI North Anna – 042 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.

Response

The evaluation results are valid.



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Proposed Plan Change

The Orange County RERP will be revised to describe the participation of Orange County medical transport providers in the annual medical emergency drills.

RAI North Anna – 042 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.

Response

The evaluation results are valid.

Proposed Plan Change

The Spotsylvania County RERP will be revised to describe the participation of Spotsylvania County medical transport providers in the annual medical emergency drills.

RAI North Anna – 043 A Commonwealth of Virginia

Subject: Implementing Corrective Actions Identified at Drills and Exercises

Basis: NUREG-0654 Evaluation Criterion N.5

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The evaluation results are valid. The Commonwealth of Virginia uses several mechanisms to track corrective actions such as, 1.) the AAR (After Action Report) and, 2.) interim findings during and post exercise demonstrations.

Proposed Plan Change

The COVRERP will be revised to include a description of these mechanisms no later than 30 days prior to the 2009 Surry biennial exercise.



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RAI North Anna – 043 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 ensure corrective actions are implemented.

Response

The response to this RAI for Louisa County is the same as the response to RAI 043 A for the Commonwealth of Virginia.

Proposed Plan Change

The Louisa RERP will be revised to include a description of these mechanisms no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 043 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 043 A for the Commonwealth of Virginia.

Proposed Plan Change

The Caroline RERP will be revised to include a description of these mechanisms no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 043 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.



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Response

The response to this RAI for Hanover County is the same as the response to RAI 043 A for the Commonwealth of Virginia.

Proposed Plan Change

The Hanover RERP will be revised to include a description of these mechanisms no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 043 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 043 A for the Commonwealth of Virginia.

Proposed Plan Change

The Orange RERP will be revised to include a description of these mechanisms no later than 30 days prior to the North Anna 2010 biennial exercise.

RAI North Anna – 043 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 043 A for the Commonwealth of Virginia.

Proposed Plan Change

The Spotsylvania RERP will be revised to include a description of these mechanisms no later than 30 days prior to the North Anna 2010 biennial exercise.



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RAI North Anna – 044 A Commonwealth of Virginia

Subject: Training of Personnel Provided as Part of Mutual Aid Agreements
Basis: NUREG-0654 Evaluation Criterion O.1.b
SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The evaluation results are valid; however, training is offered and provided annually to the organizations and agencies listed in the COVRERP. For purpose of this evaluation criteria, the COVRERP serves as the binding document or agreement under the Code of Virginia, Emergency Services and Disaster Laws of 2000 (§ 44-146.13 et. Seq.).

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 044 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.

Response

The response to this RAI for Louisa County is the same as the response to RAI 044 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.



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RAI North Anna – 044 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 044 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 044 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 044 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 044 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 044 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Orange County RERP are proposed.



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RAI North Anna – 044 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 personnel that are part of mutual aid agreements.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 044 A for the Commonwealth of Virginia.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 045 A Louisa County

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

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.

Response

The scope of the training program is provided in the Commonwealth of Virginia Annual Letter of Certification.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 045 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



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support staff). Information is not provided on the scope of the training program. Provide specific information on the scope of the training program.

Response

The response to this RAI for Caroline County is the same as the response to RAI 045 A for Louisa County.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.

RAI North Anna – 045 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 045 A for Louisa County.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 045 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 program. Provide specific information on the scope of the training program.

Response

The response to this RAI for Orange County is the same as the response to RAI 045 A for Louisa County.



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Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 045 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 045 A for Louisa County.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.

RAI North Anna – 046 A Commonwealth of Virginia

Subject: Training Requirement for Individuals Responsible for the Planning Effort

Basis: NUREG-0654 Evaluation Criterion P.1

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The evaluation results are valid. The Section that states that "Key planners will be sent to the Radiological Emergency Planning Course at the Emergency Management Institute," will be deleted from the COVRERP. Key planner is no longer used in the COVRERP. Training is provided to all COVRERP planners consistent with their functional area.



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The COVRERP will be revised to 1.) remove references to key planners and the Emergency Management Institute and 2.) revise to address training for COVRERP planners no later than the Surry 2009 biennial exercise.

RAI North Anna – 046 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.

Response

The response to this RAI for Louisa County is the same as the response to RAI 046 A for the Commonwealth of Virginia.

Proposed Plan Change

The Louisa County RERP will be revised to remove references to key planners and revise to address training for local planners no later than the North Anna 2010 biennial exercise.

RAI North Anna – 046 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. Provide information on the identification of the "key planner" and what training that person will receive.

Response

The response to this RAI for Caroline County is the same as the response to RAI 046 A for the Commonwealth of Virginia.

Proposed Plan Change

The Caroline County RERP will be revised to remove references to key planners and revise to address training for local planners no later than the North Anna 2010 biennial exercise.



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RAI North Anna – 046 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 046 A for the Commonwealth of Virginia.

Proposed Plan Change

The Hanover County RERP will be revised to remove references to key planners and revise to address training for local planners no later than the North Anna 2010 biennial exercise.

RAI North Anna – 046 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 046 A for the Commonwealth of Virginia.

Proposed Plan Change

The Orange County RERP will be revised to remove references to key planners and revise to address training for local planners no later than the North Anna 2010 biennial exercise.

RAI North Anna – 046 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



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for this position. Provide information on the identification of the "key planner" and what training that person will receive.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 046 A for the Commonwealth of Virginia.

Proposed Plan Change

The Spotsylvania County RERP will be revised to remove references to key planners and revise to address training for local planners no later than the North Anna 2010 biennial exercise.

RAI North Anna – 047 A Commonwealth of Virginia

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

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 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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2009 COVRERP revision, the "Record of Changes" located before the Table of Contents will include a summary of changes made to the plan (inclusive of changes made as a result of drills or exercises).

RAI North Anna – 047 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



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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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Louisa County RERP revision, the "Record of Changes" will include a summary of changes made to the plan (inclusive of changes made as a result of drills or exercises).

RAI North Anna – 047 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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Caroline County RERP revision, the "Record of Changes" will include a summary of changes made to the plan (inclusive of changes made as a result of drills or exercises).

RAI North Anna – 047 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



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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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Hanover County RERP revision, the "Record of Changes" will include a summary of changes made to the plan (inclusive of changes made as a result of drills or exercises).

RAI North Anna – 047 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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Orange County RERP revision, the "Record of Changes" will include a summary of changes made to the plan (inclusive of changes made as a result of drills or exercises).

RAI North Anna – 047 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



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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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Spotsylvania County RERP revision, the "Record of Changes" will include a summary of changes made to the plan (inclusive of changes made as a result of drills or exercises).

RAI North Anna – 048 A.1 Commonwealth of Virginia

Subject: Revisions of Plans Marked and Dated and Distributed

Basis: NUREG-0654 Evaluation Criterion P.5

SRP ACCEPTANCE CRITERION: Requirement H

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

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2009 COVRERP revision, plan changes will be indicated in the "Record of Changes" (e.g., section or page numbers, date, etc.) and a distribution list identifying agencies or organizations that are to receive the plan will be included.



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RAI North Anna – 048 A.2 Commonwealth of Virginia

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.

Response

The VDH/DRH ERP was not written and is not maintained in accordance with NUREG-0654 / FEMA-REP-1 Evaluation Criterion P.5. The VDH maintains the VDH/DRH ERP consistent with its internal processes. The VDH/DRH Assistant Director (Radon, Environmental, and Emergency Preparedness) is responsible for technical revisions.

VDH/DRH ERP Appendix 17 procedures may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the VDH/DRH ERP are proposed.

RAI North Anna – 049 A Commonwealth of Virginia

Subject: Listing of Supporting Plans and Their Source

Basis: NUREG-0654 Evaluation Criterion P.6

SRP ACCEPTANCE CRITERION: Requirement H

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 COVRRP. 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 COVRRP. Provide information on the school plans, hospital plans, and any other special facility plans.



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Response

Within the Commonwealth of Virginia, government entities and school districts are aligned. Therefore, school plans are included within the jurisdiction's RERP. School plans may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

As described in response to RAI 035 A, plans for the Medical College of Virginia (MCV) Hospital and Mary Washington Hospital may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the COVRERP are proposed.

RAI North Anna – 049 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.

Response

The Louisa County school plans are included within the Louisa County RERP. School plans may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the Louisa County RERP are proposed.

RAI North Anna – 049 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.

Response

The Caroline County school plans are included within the Caroline County RERP. School plans may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the Caroline County RERP are proposed.



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RAI North Anna – 049 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.

Response

The Hanover County school plans are included within the Hanover County RERP. School plans may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the Hanover County RERP are proposed.

RAI North Anna – 049 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.

Response

The Orange County school plans are included within the Orange County RERP. School plans may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the Orange County RERP are proposed.

RAI North Anna – 049 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.

Response

The Spotsylvania County school plans are included within the Spotsylvania County RERP. School plans may be reviewed at the Virginia Department of Emergency Management Trade Court Facility.

Proposed Plan Change

No changes to the Spotsylvania County RERP are proposed.



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RAI North Anna – 050 A.1 Commonwealth of Virginia

Subject: *Detailed Listing of Implementing Procedures and Sections of Plans Being Implemented*

Basis: *NUREG-0654 Evaluation Criterion P.7*

SRP ACCEPTANCE CRITERION: *Requirement H*

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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2009 COVRERP revision, the detailed listing of implementing procedures in the COVRERP Table of Contents will identify the section(s) of the plan which they implement.

RAI North Anna – 050 A2 Commonwealth of Virginia

The Virginia Department of Health/Division of Radiological 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.

Response

The VDH/DRH ERP was not written and is not maintained in accordance with NUREG-0654 / FEMA-REP-1 Evaluation Criterion P.7.

Proposed Plan Change

No changes to the VDH/DRH ERP are proposed.

RAI North Anna – 050 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



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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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Louisa County RERP revision, the detailed listing of implementing procedures will identify section(s) of the plan which they implement.

RAI North Anna – 050 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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Caroline County RERP revision, the detailed listing of implementing procedures will identify section(s) of the plan which they implement.

RAI North Anna – 050 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.

Response

The evaluation results are valid.



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Proposed Plan Change

Beginning with the 2010 Hanover County RERP revision, the detailed listing of implementing procedures will identify section(s) of the plan which they implement.

RAI North Anna – 050 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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Orange County RERP revision, the detailed listing of implementing procedures will identify section(s) of the plan which they implement.

RAI North Anna – 050 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.

Response

The evaluation results are valid.

Proposed Plan Change

Beginning with the 2010 Spotsylvania County RERP revision, the detailed listing of implementing procedures will identify section(s) of the plan which they implement.



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RAI North Anna – 051 A.1 Commonwealth of Virginia

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

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.

Response

The NUREG-0654/FEMA-REP-1 Cross Reference does not provide specific reference information in all cases.

Proposed Plan Change

The COVRERP's NUREG-0654/FEMA-REP-1 Cross Reference will be revised to add specificity. This revision will be made no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 051 A.2 Commonwealth of Virginia

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.

Response

The VDH/DRH ERP was not written and is not maintained in accordance with NUREG-0654 / FEMA-REP-1 Evaluation Criterion P.8.

Proposed Plan Change

No changes to the VDH/DRH ERP are proposed.

RAI North Anna – 051 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.



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Response

The response to this RAI for Louisa County is the same as the response to RAI 051 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

The Louisa RERP's NUREG-0654/FEMA-REP-1 Cross Reference will be revised to add specificity. This revision will be made no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 051 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. 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.

Response

The response to this RAI for Caroline County is the same as the response to RAI 051 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

The Caroline RERP's NUREG-0654/FEMA-REP-1 Cross Reference will be revised to add specificity. In addition, listings in the Table of Contents will be revised to correspond with listings provided at the beginning of the sections in the plan. This revision will be made no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 051 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.

Response

The response to this RAI for Hanover County is the same as the response to RAI 051 A.1 for the Commonwealth of Virginia.



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Proposed Plan Change

The Hanover RERP's NUREG-0654/FEMA-REP-1 Cross Reference will be revised to add specificity. This revision will be made no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 051 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.

Response

The response to this RAI for Orange County is the same as the response to RAI 051 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

The Orange RERP's NUREG-0654/FEMA-REP-1 Cross Reference will be revised to add specificity. This revision will be made no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 051 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.

Response

The response to this RAI for Spotsylvania County is the same as the response to RAI 051 A.1 for the Commonwealth of Virginia.

Proposed Plan Change

The Spotsylvania RERP's NUREG-0654/FEMA-REP-1 Cross Reference will be revised to add specificity. In addition, listings in the Table of Contents will be revised to correspond with listings provided at the beginning of the sections in the plan. This revision will be made no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 052 A Commonwealth of Virginia

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

Basis: NUREG-0654 Evaluation Criterion P.10

SRP ACCEPTANCE CRITERION: Requirement H

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.

Response

The evaluation results are valid. This section of the COVRERP was written in accordance with NUREG-0654/FEMA-REP-1 Evaluation Criterion P.10: "Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly."

Proposed Plan Change

The COVRERP will be revised to address responsibilities for updating call-down lists and maps no later than 30 days prior to the 2009 Surry biennial exercise.

RAI North Anna – 052 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.

Response

The evaluation results are valid. This section of the Louisa County RERP was written in accordance with NUREG-0654/FEMA-REP-1 Evaluation Criterion P.10: "Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly."

Proposed Plan Change

The Louisa County RERP will be revised to address responsibilities for updating call-down lists and maps no later than 30 days prior to the 2010 North Anna biennial exercise.



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RAI North Anna – 052 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.

Response

The evaluation results are valid. This section of the Caroline County RERP was written in accordance with NUREG-0654/FEMA-REP-1 Evaluation Criterion P.10: "Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly."

Proposed Plan Change

The Caroline County RERP will be revised to address responsibilities for updating call-down lists and maps no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 052 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.

Response

The evaluation results are valid. This section of the Hanover County RERP was written in accordance with NUREG-0654/FEMA-REP-1 Evaluation Criterion P.10: "Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly."

Proposed Plan Change

The Hanover County RERP will be revised to address responsibilities for updating call-down lists and maps no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 052 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.



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Response

The evaluation results are valid. This section of the Orange County RERP was written in accordance with NUREG-0654/FEMA-REP-1 Evaluation Criterion P.10: "Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly."

Proposed Plan Change

The Orange County RERP will be revised to address responsibilities for updating call-down lists and maps no later than 30 days prior to the 2010 North Anna biennial exercise.

RAI North Anna – 052 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.

Response

The evaluation results are valid. This section of the Spotsylvania County RERP was written in accordance with NUREG-0654/FEMA-REP-1 Evaluation Criterion P.10: "Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly."

Proposed Plan Change

The Spotsylvania County RERP will be revised to address responsibilities for updating call-down lists and maps no later than 30 days prior to the 2010 North Anna biennial exercise.

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