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Attention: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

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DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNITS 1, 2, 3 AND ISFSI
PROPOSED CHANGE TO THE MILLSTONE POWER STATION
EMERGENCY PLAN

Dominion Nuclear Connecticut, Inc. (DNC) is proposing a change to the Millstone Power Station Emergency Plan. The proposed change is a replacement of reference to an Emergency Medical Technician (EMT) with reference to a licensee first aid team, which is consistent with the planning standards and evaluation criterion of NUREG-0654/FEMA-REP-1, Revision 1, Section II.O.3. The plan, as changed, would continue to meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR 50. Pursuant to 10 CFR 50.54(q), DNC requests approval of this proposed change to the Millstone Power Station Emergency Plan prior to implementation. The proposed change will effect reference to an EMT with reference to a licensee first aid team in the Table of Contents (TOC), Sections 5, 5.1.10, 5.1.11, Table 5.1, Sections 6.5, 6.5.4, 7.11, 8.1.3.b, 8.1.3.c, and Appendix A. DNC has reviewed the proposed change in accordance with 10 CFR 50.54(q), and has determined this change will decrease the effectiveness of the approved emergency plan.

The proposed change with justification is provided in Attachment 1 to this letter.

Should you have any questions in regard to this submittal, please contact Mr. Tom Szymanski at 804-273-3065.

Sincerely,



Leslie N. Hartz
Vice President – Nuclear Support Services

Commitments made in this letter: None

Attachment: 1

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ATTACHMENT 1

**DISCUSSION AND JUSTIFICATION FOR PROPOSED CHANGE TO
MILLSTONE POWER STATION EMERGENCY PLAN**

**MILLSTONE POWER STATION UNITS 1, 2, 3 AND ISFSI
DOMINION NUCLEAR CONNECTICUT, INC.**

Background

Millstone Power Station Emergency Plan Table 5-1, Station Emergency Response Organization, combines the major functional areas of firefighting and the first-aid portion of Rescue Operations and First-Aid. The plan currently specifies emergency medical training for the Fire Brigade at the emergency medical technician (EMT) level. The Fire Brigade was reorganized last year from being a separate entity to being an Operations Department function. Training for the reorganized Fire Brigade does not require maintenance of EMT qualifications; however, the requirements of the Emergency Plan continue to be met using personnel with EMT qualifications.

Regulatory Evaluation

Regulatory Guide 1.101 "Emergency Planning and Preparedness for Nuclear Power Reactors" Revision 5, July 2005, provides the methods the NRC staff considers acceptable for complying with the requirements in Appendix E to 10 CFR 50 and the planning standards in 10 CFR 50.47(b) that must be met in onsite and offsite emergency response plans. These criteria provide a basis for NRC licensees and State and local governments to develop acceptable radiological emergency plans and improve emergency preparedness. Regulatory Guide 1.101 endorses the use of NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

Regulatory Issue Summary 2005-02, "Clarifying the Process for Making Emergency Plan Changes", dated February 14, 2005, provides a framework for determining whether a change to an emergency preparedness requirement constitutes a decrease in effectiveness. A change that would degrade the capability to perform a function or relax the time requirements of affected emergency preparedness requirements is considered a decrease in effectiveness.

10 CFR 50.47(b) states "The onsite and, except as provided in paragraph (d) of this section, offsite emergency response plans for nuclear power reactors must meet the following standards:" Item 15 of these standards states: "(15) Radiological emergency response training is provided to those who may be called on to assist in an emergency."

Regulatory Evaluation (continued)

NUREG-0654/FEMA-REP-1, Section II, "Planning Standards and Evaluation Criteria," items II.O.3 and II.O.4 address the 10 CFR 50.47(b)(15) planning standard. II.O.3 specifies the type of training to be provided to licensee first aid team members who may be called on to assist in an emergency as: "II.O.3: Training for individuals assigned to licensee first aid teams shall include courses equivalent to Red Cross Multi-Media." Item II.O.4 specifies categories of training to be provided in a training program for instructing and qualifying personnel who will implement radiological emergency response plans. Item II.O.4.f specifies: "First aid and rescue personnel" as one of these categories.

Additionally, the following three 10 CFR 50.47(b) standards and their associated NUREG-0654/FEMA-REP-1 evaluation criteria were evaluated with respect to this proposed change:

- Emergency planning standard 10 CFR 50.47(b)(2) states, in part: "On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, ..." Items II.B.1 and II.B.5 specify on-shift emergency organization responsibilities and duties.
- Emergency planning standard 10 CFR 50.47(b)(12) states: "Arrangements are made for medical services for contaminated injured individuals." Item II.L.2 specifies provisions for on-site first aid capability.
- Emergency planning standard 10 CFR 50.47(b)(14) states, in part: "Periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected." Item II.N.2.c specifies conduct of annual medical emergency drills and items II.N.3, II.N.4 and II.N.5 specify scenario composition, critique and corrective action.

10 CFR 50.54(q) requires, "Proposed changes that decrease the effectiveness of the approved emergency plans may not be implemented without application to and approval by the Commission. The licensee shall submit, as specified in 10 CFR 50.4, a report of each proposed change for approval."

Discussion of Change

The replacement of reference to an EMT with reference to a licensee first aid team is consistent with the planning standards and evaluation criteria of NUREG-0654/FEMA-REP-1, Revision 1, Section II.O.3. The plan, as changed, would continue to meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR 50.

The proposed change will replace reference to an EMT with reference to a licensee first aid team in the TOC, Sections 5, 5.1.10, 5.1.11, Table 5.1, Sections 6.5, 6.5.4, 7.11, 8.1.3.b, 8.1.3.c, and Appendix A.

Regulatory Issue Summary (RIS) 2005-02 defines a decrease in effectiveness as a change in an emergency preparedness (EP) requirement that results in the degradation or loss of the capability to perform a function or perform a function in a timely manner, as contained in the emergency plan. RIS 2005-02 clarifies a change in an EP requirement based on capability, means the emergency plan as changed, would result in the loss or degradation of the capability to meet the regulatory requirements of an emergency plan. Consequently, the capability to perform a function(s) as previously stated in the emergency plan no longer exists or is degraded. RIS 2005-02 defines an EP requirement, in part, as a statement made in the emergency plan which addresses how a particular regulatory requirement will be met and emphasizes all EP requirements are subject to the 10 CFR 50.54(q) change process. Thus, the replacement of the Millstone Power Station Emergency Plan reference to an EMT with reference to a licensee first aid team (trained to the equivalent of Red Cross Multi-Media) constitutes a decrease in effectiveness and requires prior approval before implementation.

The following table provides a list of the proposed change to the Millstone Power Station Emergency Plan. The table shows the affected section, current statement and the proposed change.

	Current	Proposed
TOC, page i:	5.1.10 Fire Brigade/EMT	5.1.10 Fire Brigade 5.1.11 First Aid Team (Added to Plan)
Section 5, Emergency Response Organization, Page 5-2:	The on-shift/on-site positions are part of the normal station organization, which includes: <ul style="list-style-type: none"> • Fire Brigade / EMT 	The on-shift/on-site positions are part of the normal station organization, which includes: <ul style="list-style-type: none"> • Fire Brigade • First Aid Team (Added to Plan)

Section 5.1.10, Page 5-5:	Fire Brigade / EMT The Fire Brigade provides immediate response to a fire on-site. <i>EMT qualified personnel assigned to the Fire Brigade provide emergency medical services for on-site personnel injuries.</i>	Fire Brigade The Fire Brigade provides immediate response to a fire on-site.
Section 5.1.11, Page 5-5:		First Aid Team The First Aid Team provides emergency medical services for injuries to on-site personnel. (Added to Plan)

<p>Table 5.1, Station Emergency Response Organization, Page 5-17</p>	<ul style="list-style-type: none"> • Major Functional Area: Firefighting • Major Tasks: Firefighting / Emergency Medical Services • Normal Position/Title: Fire Brigade / EMT • Emergency Position/Title: Fire Brigade / EMT • Emergency Location: As Required • On-Shift: Per TS (a) • Minimum Staffing: 30-60 Minutes: -blank- • Minimum Staffing: 60 minutes: Local Comm Support • Full Staffing: -blank- • Training Summary: 1 [Overview] • Rad Worker: YES • Resp Qual: YES 	<ul style="list-style-type: none"> • Major Functional Area: Firefighting • Major Tasks: Firefighting • Normal Position/Title: Fire Brigade • Emergency Position/Title: Fire Brigade • Emergency Location: As Required • On-Shift: Per TS (a) • Minimum Staffing: 30-60 Minutes: -blank- • Minimum Staffing: 60 minutes: Local Comm Support • Full Staffing: -blank- • Training Summary: 1 [Overview] • Rad Worker: YES • Resp Qual: YES <p>Major Functional Area: First Aid</p> <ul style="list-style-type: none"> • Major Tasks: Emergency Medical Services • Normal Position/Title: First Aid Team • Emergency Position/Title: First Aid Team • Emergency Location: As Required • On-Shift: 2 (a) • Minimum Staffing: 30-60 Minutes: -blank- • Minimum Staffing: 60 minutes: Local Comm Support • Full Staffing: -blank- • Training Summary: 1 [Overview] • Rad Worker: YES • Resp Qual: NO (Added to Plan)
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<p>Section 6.5, Aid to Affected Personnel, Page 6-15</p>	<p>Provisions are made to assist personnel who are injured and/or have received high radiation exposures. EMT qualified personnel, assigned to the Fire Brigade, provide on-site emergency medical services. First aid and decontamination facilities are available on-site and off-site. The following subsections describe measures to be used to provide necessary assistance.</p>	<p>Provisions are made to assist personnel who are injured and/or have received high radiation exposures. First aid qualified personnel provide on-site emergency medical services. First aid and decontamination facilities are available on-site and off-site. The following subsections describe measures to be used to provide necessary assistance.</p>
<p>Section 6.5.4. First Aid, Page 6-17:</p>	<p>EMT qualified personnel are available to assist ill or injured personnel on-site 24 hours per day. If necessary a physician may be requested to provide medical assistance on-site.</p>	<p>First aid qualified personnel are available to assist ill or injured personnel on-site 24 hours per day. If necessary a physician may be requested to provide medical assistance on-site.</p>
<p>Section 7.11. First Aid and Medical Facilities, Page 7-10:</p>	<p>24 hour per day first aid services are provided by EMT qualified personnel. First aid supplies and equipment are stored in various locations throughout the station. The site Medical Facility is also available during selected hours, which may provide equipment and personnel to assist in medical emergencies.</p>	<p>24 hour per day first aid services are provided by first aid qualified personnel with, as a minimum, multi-media first aid training. First aid supplies and equipment are stored in various locations throughout the station. The site Medical Facility is also available during selected hours, which may provide equipment and personnel to assist in medical emergencies.</p>
<p>Section 8.1.3.b, Additional Emergency Preparedness Training Fire Brigade Training, Page 8-2:</p>	<p>The Fire Brigade is composed of designated station firefighting personnel. Initial and annual refresher training is provided to Fire Brigade Members and Fire Brigade Leaders in accordance with training department procedures. Station EMTs receive certification and training through the State of Connecticut, Office of Emergency Medical Services.</p>	<p>The Fire Brigade is composed of designated station firefighting personnel. Initial and annual refresher training is provided to Fire Brigade Members and Fire Brigade Leaders in accordance with training department procedures.</p>

Section 8.1.3.c, Additional Emergency Preparedness Training First Aid Team Training, Page 8-2:		Station first aid teams are provided a Medic first aid training program: "BasicPlus – CPR, AED and First Aid for Adults" or equivalent, at a minimum. (Added to Plan)
Appendix A, Definitions, Abbreviations and Acronyms, Page A-5:	Emergency Medical Technician - Personnel assigned to the Fire Brigade which maintain EMT certification with the State of Connecticut.	Delete definition of EMT.

Current Status

The Plant Equipment Operators (PEOs) on all ten unit operating shifts have completed the Medic First Aid training program - "BasicPlus - CPR, AED and First Aid for Adults." New PEOs will be trained as part of Non-Licensed Operator Initial Training (NLIT). This is equivalent to Red Cross Multi-Media First Aid training. Retraining is performed every 2 years as part of Non-Licensed Operator Continuing Training (NLCT). Therefore, approximately 3 to 4 first aid trained PEOs per unit are available each shift to provide first aid capability on a 24-hour basis. Electrical Maintenance personnel are also provided this training.

Conclusion

The replacement of references to EMT with references to a licensee first aid team is consistent with the planning standards and evaluation criterion of NUREG-0654/FEMA-REP-1, Revision 1, Section II.O.3. The plan, as changed, would continue to meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR 50.

The proposed change will replace reference to an EMT with reference to a licensee first aid team in the TOC, Sections 5, 5.1.10, 5.1.11, Table 5.1, Sections 6.5, 6.5.4, 7.11, 8.1.3.b, 8.1.3.c, and Appendix A. DNC has reviewed this change in accordance with 10 CFR 50.54(q), and has determined that the proposed change will decrease the effectiveness of the plan and require prior approval before implementation.