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

Serial No. NA3-09-017RB  
Docket No. 52-017  
COL/JPH

**DOMINION VIRGINIA POWER**  
**NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER 036**  
**REVISED (FSAR Chapter 13)**

On August 3, 2009, Dominion provided a response to RAI Question 13.03-5, Clarification of New EOF, which stated that Dominion decided to use the existing Local Emergency Operating Facility (LEOF) and Central Emergency Operations Facility (CEOF) currently used for North Anna Units 1 and 2. Following this submittal, there was further discussion between the NRC and Dominion regarding the existing EOF facilities and North Anna COLA FSAR Table 2.3-1, ITAAC for Emergency Planning, acceptance criteria. Dominion agreed to revise its response. This revised response clarifies how the EOF ITAAC acceptance criteria are addressed in North Anna COLA FSAR Table 2.3-1, ITAAC for Emergency Planning.

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

Very truly yours,

Eugene S. Grecheck

D089  
NRO

Enclosures:

1. Revised response to RAI Letter Number 036, RAI Question 13.03-5

Commitments made by this letter:

1. None.

COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

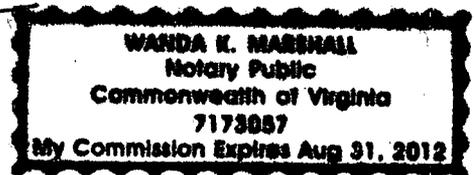
The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President-Nuclear Development of Virginia Electric and Power Company (Dominion Virginia Power). He has affirmed before me that he is duly authorized to execute and file the foregoing document on behalf of the Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 17<sup>th</sup> day of November, 2009

My registration number is 7173057 and my

Commission expires: August 31, 2012

Wanda K. Marshall  
Notary Public



cc: U. S. Nuclear Regulatory Commission, Region II  
T. A. Kevern, NRC  
J. Jessie, NRC  
J. T. Reece, NRC

**ENCLOSURE 1**

**Response to NRC RAI Letter 036**

**RAI Question 13.03-5 Revised**

**NRC RAI 13.03-5**

*In response to RAI 13.03-2.12, the applicant stated that the existing Local Emergency Operations Facility (LEOF) and Central Emergency Operations Facility (CEOF) to support North Anna Units 1 and 2 will not support Unit 3. The applicant further stated the following: "In Unit 3 emergency plan, Section II.H.2, the exception to the guidance in NUREG-0696 is for the proposed EOF at Dominion's Innsbrook Technical Center in Glen Allen, Virginia. A formal request for the exception will be submitted to the NRC to enable construction prior to and demonstration during the full participation exercise."*

*The introduction of a new EOF facility - to be located approximately 30 miles from Unit 3 precludes a full evaluation and finding by the staff as to its adequacy, in support of Unit 3, because the applicant has not followed the appropriate process for such a request. The applicant indicates (1) it is requesting (in the COL application) NRC approval of the proposed location for the EOF, and (2) it will be submitting a formal request for an exception to the NRC to enable construction of the EOF. The applicant's intended path for NRC approval of the new EOF is unclear, in relation to the applicable regulatory bases in support of NRC's reasonable assurance determination associated with emergency planning, and issuance of a combined license for Unit 3. The applicant's self-identified need to submit a formal exception request is undefined, in relation to the regulatory basis, as well as the proper form and content of such a request. In addition, the application does not fully address the generic ITAAC that would be required for a new EOF, which is provided in ITAAC 8.2 of Table C.II.2-B1 in Regulatory Guide 1.206.*

*The applicant is requested to clarify, and submit appropriate documentation in support of the EOF for Unit 3, consistent with NUREG-0696 and Sections 13.3 and 14.3.10 of NUREG-0800.*

**Dominion Response**

Dominion will use the existing Local Emergency Operations Facility (LEOF) and Central Emergency Operations Facility (CEOF) currently used for North Anna Units 1 and 2 to support Unit 3 Emergency Preparedness activities. Part 5 of the North Anna 3 COLA will be revised to reflect this decision.

The acceptance criteria for the EOF which is provided in ITAAC 8.2 of Table C.II.2-B1 in Regulatory Guide 1.206 is addressed in the North Anna 3 COLA FSAR Table 2.3-1, ITAAC for Emergency Planning, acceptance criteria 1.1.2, 3.1.2, 3.2, 5.2.1, 5.2.2, 6.4, & 8.1.1.D and will be applied to the existing North Anna LEOF facility as listed below.

**RG 1.206 ITAAC 8.2**

8.2.1  
8.2.2  
8.2.3  
8.2.4

**NA3 Table 2.3-1**

5.2.1  
8.1.1  
3.1.2, 3.2, 5.2.2  
1.1.2, 6.4

**Proposed COLA Revision**

Part 5, Section II.H.2 will be revised as shown in attached markup.

### **Markup of North Anna COLA**

The attached markup represents Dominion's good faith effort to show how the COLA will be revised in a future COLA submittal in response to the subject RAI. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be somewhat different than as presented herein.

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emergency response data system (ERDS) data with the NRC Operations Center is also provided as appropriate. Section II.F provides a description of the communications capabilities provided in the TSC.

Display capability of the technical data system in the TSC includes a workstation that, at minimum, is capable of displaying the parameters that are required ~~by the Human System Interface (HSI) of a Safety Parameter Display System (SPDS)~~. The HSI SPDS function is described in DCD Section 18.8 through its incorporated references.

Key reference materials are available to the TSC staff via Local Area Network connection from the Nuclear Electronic Document Library, including:

- Up-to-date, as-built drawings, schematics, and diagrams showing conditions and locations of plant structures and systems down to component level
- Plant technical specifications
- Plant operating procedures
- Emergency operating procedures
- Final Safety Analysis Report
- Up-to-date records related to licensee, State, and local emergency response plans
- Offsite population distribution data
- Evacuation plans

Section II.H.9 provides a description of the OSC.

## **2. Emergency Operations Facility**

The function of the EOF is to provide a location for Dominion management to direct and coordinate emergency response activities, with emphases on providing support to the plant staff and coordinating emergency response activities with offsite response agencies.

~~The EOF is located at Dominion's Innsbrook Technical Center in Glen Allen, Virginia, approximately 30 miles from Unit 3. Because the proposed location of the EOF involves an exception to the guidance in NUREG-0696 for locating an EOF within 20 miles of the TSC, Dominion is requesting NRC approval of the proposed location for the EOF. This request does not alter the functions of the EOF as described in NUREG-0696.~~

The Local EOF and Central EOF are the same as those used for NAPS Units 1 and 2. The Local EOF is located within the owner-controlled area and the Central EOF at Dominion's Innsbrook Technical Center in Glen Allen, Virginia, approximately 30 miles from Unit 3. This configuration does not alter the functions of the EOF as described in NUREG-0696.

Provisions are made for staffing of the EOF by Dominion, Commonwealth of Virginia, ~~risk jurisdiction,~~ and NRC personnel. Dominion also makes provisions for accommodating a limited number of media personnel in the EOF. Section II.B.5 provides a description of the Dominion EOF staff. ~~Section II.O.5~~ Section II.O.4 provides a description of emergency response organization training and qualification.

The size of the EOF is sufficient to support 35 people. The Local EOF was designed to provide a specified protection factor from gamma radiation. The Local EOF also has a specially designed ventilation system to limit the exposure of its occupants and further assure its availability during an emergency. Provisions exist for dedicated radiation monitoring equipment to measure airborne particulate and direct radiation. The location of the Central EOF precludes the necessity of providing radiation monitoring systems.

Section II.F provides a description of the communications capabilities provided in the EOF.

The Local EOF and Central EOF draws ~~its primary~~ power from commercial power sources. There is electrical generator backup power to the Central EOF. A loss of commercial power should not impact any of the voice or data communications equipment located in the Central EOF. Common Dominion telecommunications infrastructure that supports EOF functions, including, but not limited to, fiber optic transmission equipment, telephone switching equipment and data network routers, is configured to operate from at least one and usually multiple backup power sources in the event of a loss of commercial power. These backup sources include generator, DC battery and UPS systems.

Display capability of the technical data system in the EOF includes a workstation that, at minimum, is capable of displaying the parameters that are required ~~by the Human System Interface (HSI) of an SPDS.~~ The HSI-SPDS function is described in DCD Section 18.8 through its incorporated references.

Key reference materials will be available to the EOF staff via Local Area Network connection from the Nuclear Electronic Document Library, including:

- Plant technical specifications
- Plant operating procedures
- Emergency operating procedures
- Final Safety Analysis Report
- Up-to-date records related to licensee, State, and local emergency response plans
- Offset population distribution data
- Evacuation plans