

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

December 7, 2009

Attention: Document Control Desk
Director, Division of Nuclear Security
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Serial No.: 09-741A
NL&OS/MAE: R0
Docket Nos.: 50-280/281
License Nos.: DPR-32/37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
REQUEST FOR EXEMPTION FROM 10 CFR 73.55
POWER REACTOR SECURITY REQUIREMENTS FINAL RULE
ADDITIONAL INFORMATION

In a letter dated December 7, 2009 (Serial No. 09-741), Virginia Electric and Power Company (Dominion) requested exemptions from portions of 10 CFR 73.55, Power Reactor Security Requirements. These exemption requests were regarding recent rule making published in the March 27, 2009 Federal Register. The exemption requests would allow the compliance date for a certain requirements in the rule to be extended from March 31, 2010 to August 31, 2010 and August 31, 2011. The additional time is needed due to the large scope of work required to meet the requirements of the new 10 CFR 73.55. Compliance with the requirements discussed in the current Physical Security Plan will continue to be met during this extension period.

The purpose of this letter is to provide an Environmental Assessment (attached) as requested by the NRC staff in support of the exemption requests. If you have any questions, please contact Ms. Margaret Earle at (804) 273-2768.

Sincerely,



Leslie N. Hartz
Vice President – Nuclear Support Services
Virginia Electric and Power Company

Attachment

Commitments made by this letter: None

5001
NSI202
NSI208

cc: U. S. Nuclear Regulatory Commission
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Attachment

Environmental Assessment

1. Describe any change to the types, characteristics, or quantities of non-radiological effluents discharged to the environment as a result of the proposed exemption.

Response

There are no expected changes in the types, characteristics, or quantities of non-radiological effluents discharged to the environment associated with the proposed schedule exemption. This proposed exemption only deals with the timing of implementing certain security requirements. There are no materials or chemicals introduced into the plant that could affect the characteristics or types of non-radiological effluents. In addition, the method of operation of non-radiological waste systems will not be affected by this change. This proposed exemption will not result in changes to the design basis requirements for the structures, systems, and components (SSCs) that function to limit the release of non-radiological effluents during and following postulated accidents. All the SSCs associated with limiting the release of offsite non-radiological effluents will therefore continue to be able to perform their functions, and as a result, there is no significant non-radiological effluent impact as a result of granting this request for a schedule exemption to implement certain security requirements.

2. Describe any changes to liquid radioactive effluents discharged as a result of the proposed exemption request.

Response

There are no expected changes to the liquid radioactive effluents discharged as a result of this proposed schedule exemption. The proposed exemption will not cause an interaction to produce any different quantity or type of radioactive material in the reactor coolant system. This exemption will not result in changes to the design basis requirements for the SSCs that function to limit the release of liquid radiological effluents during and following postulated accidents. All the SSCs associated with limiting the release of liquid radiological effluents will therefore continue to be able to perform their functions, and as a result, there is no significant liquid radiological effluent impact as a result of granting this request for a schedule exemption to implement certain security requirements.

3. Describe any changes to gaseous radioactive effluents discharged as a result of the proposed exemption.

Response

For the same reasons as described in number 2 above, this proposed schedule exemption would have no effects on the characteristics of gaseous radioactive effluents.

4. Describe any change in the type or quantity of solid radioactive waste generated as a result of the proposed exemption.

Response

This proposed schedule exemption will not result in changes to the design basis requirements for the structures, systems, and components (SSCs) that function to limit the release of solid waste during and following postulated accidents. All the SSCs associated with limiting the release of solid radioactive waste will therefore continue to be able to perform their function.

5. What is the expected change in occupational dose as a result of the proposed exemption under normal and design basis accident conditions?

Response

Under normal power operation there would be no expected radiological impact on either the workforce or the public. Therefore, there are no expected changes in normal occupational operating doses. Likewise, control room dose is not impacted by the proposed schedule exemption.

6. What is the expected change in the public dose as a result of the proposed change under normal and DBA accident conditions?

Response

Dose to the public will not be changed by the proposed schedule exemption during normal operations. As noted in items 2, 3 and 4 above there is no basis to postulate an increased source of liquid, gaseous or solid radiological effluents that could contribute to increased public exposure during normal operations and DBA conditions as a result of granting this request for a schedule exemption to implement certain security requirements. The proposed schedule exemption does not impact systems used during normal operation nor systems used to detect or mitigate a DBA.

7. What is the impact to land disturbance for the proposed exemption?

Response

This proposed exemption request only deals with the timing of implementing

certain security requirements. There is no land disturbance associated with this exemption request.

Conclusion:

There is no significant radiological environmental impact associated with the proposed schedule exemption. The proposed schedule change for implementing certain security requirements will not affect any historical sites nor will they affect non-radiological plant effluents.