

Dominion Nuclear Connecticut, Inc.  
Millstone Power Station  
Rope Ferry Road  
Waterford, CT 06385



Dominion™

JAN 12 2010

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.: 10-015A  
NL&OS/MAE: R0  
Docket Nos.: 50-245/336/423  
License Nos.: DPR-21/65  
NPF-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNITS 1, 2 AND 3**  
**REQUEST FOR EXEMPTIONS FROM 10 CFR 73.55**  
**POWER REACTOR SECURITY REQUIREMENTS FINAL RULE**  
**ADDITIONAL INFORMATION**

In a letter dated January 12, 2010 (Serial No. 10-015), Dominion Nuclear Connecticut, Inc. (DNC) 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 were associated with the alarm stations and uninterruptible power supplies. The alarm station exemptions would allow the compliance date for certain requirements in the rule to be extended from March 31, 2010 to September 30, 2010. The uninterruptible power supply exemptions would allow the compliance date for certain requirements in the rule to be extended from March 31, 2010 to August 31, 2010. Compliance with the requirements discussed in the Physical Security Plan will continue to be met during these extension periods.

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

Attachment

Commitments made by this letter: None

NMSSO1  
NSIRO2  
NSIRO8  
NSIR/FSME

cc: U. S. Nuclear Regulatory Commission  
Region I  
Regional Administrator  
475 Allendale Road  
King of Prussia, PA 19406-1415

Mr. J. B. Hickman  
NRC Project Manager Millstone Unit 1  
U. S. Nuclear Regulatory Commission  
Mail Stop T-8 F5  
Two White Flint North  
11545 Rockville Pike  
Rockville, MD 20852-2738

Ms. C. J. Sanders  
NRC Project Manager Millstone Units 2 & 3  
U. S. Nuclear Regulatory Commission  
Mail Stop O-8-B 1A  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

Ms. L. A. Kauffman  
NRC Inspector  
475 Allendale Road  
King of Prussia, PA 19406-1415

NRC Senior Resident Inspector  
Millstone Power Station

## 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 exemptions.

#### 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 exemptions. These proposed exemptions only deal 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 these changes. These proposed exemptions 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 of granting these requests for schedule exemptions to implement certain security requirements.

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

#### Response

There are no expected changes to the liquid radioactive effluents discharged as a result of these proposed schedule exemptions. The proposed exemptions will not cause an interaction to produce any different quantity or type of radioactive material in the reactor coolant system. These exemptions 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 these requests for schedule exemptions to implement certain security requirements.

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

Response

For the same reasons as described in number 2 above, these proposed schedule exemptions would have no affect 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 exemptions.

Response

These proposed schedule exemptions 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 exemptions 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. There are no expected changes in normal occupational operating doses. Likewise, control room dose is not impacted by the proposed schedule exemptions.

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

Response

Dose to the public will not be changed by the proposed schedule exemptions 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 schedule exemptions to implement certain security requirements. The proposed exemptions do 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 exemptions?

Response

These proposed exemptions request only deals with the timing of

implementing certain security requirements. There is no land disturbance associated with these exemption requests.

Conclusion:

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