



**Dominion®**

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

Serial No. NA3-10-087RB  
Docket No. 52-017  
COL/JPH

**DOMINION VIRGINIA POWER**  
**NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 018**  
**(PART 10 – REVISED RAI 14.03.10-1.1 RESPONSE)**

During a recent discussion with the North Anna Project Manager, the NRC requested additional information related to RAI 14.03.10-1.1 to support the final review of the Emergency Preparedness (EP) portion of the North Anna Unit 3 Combined License Application (COLA). The request was to incorporate the milestone for submitting detailed EP implementing procedures 180 days prior to fuel load into Table 2.3-1, ITAAC For Emergency Planning. The revised response is provided in Enclosure 1:

- RAI Question 14.03.10-1.1 REVISED E-Plan Procedure Submittal

This information will be incorporated into a future submission of the North Anna Unit 3 COLA, as described in the Enclosure.

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

Very truly yours,

Eugene S. Grecheck

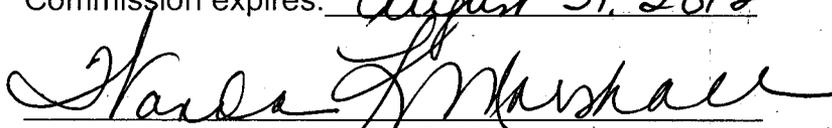
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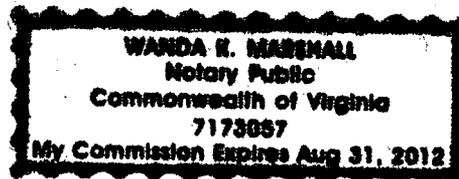
COMMONWEALTH OF VIRGINIA

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 4<sup>th</sup> day of February, 2010  
My registration number is 7173057 and my  
Commission expires: August 31, 2012

  
\_\_\_\_\_  
Notary Public



Enclosures:

1. RAI Letter No. 018, RAI Question No. 14.03.10-1.1 REVISED

Commitments made by this letter:

1. The information provided in the RAI response will be incorporated into a future submission of the North Anna Unit 3 COLA, as described in the Enclosure.

cc: U. S. Nuclear Regulatory Commission, Region II  
C. P. Patel, NRC  
J. B. Jessie, NRC  
J. T. Reece, NRC

**ENCLOSURE 1**

**Response to NRC RAI Letter 018**

**RAI Question 14.03.10-1.1 REVISED**

**NRC RAI 14.03.10-1.1**

[Basis: 10 CFR 52.79(a)(21), 10 CFR 52.80(a)]

*Part 10.ITAAC Table 2.3-1 - ITAAC Table 2.3-1, "ITAAC for Emergency Planning," does not include an ITAAC relating to the submission of detailed implementing procedures for the emergency plan no less than 180 days prior to fuel load. Such an ITAAC is identified under Planning Standard 17.0, "Implementing Procedures," in Table C.II.1-B1 of RG 1.206, issued June 20, 2007. Section II.P.7, "Implementing Procedures," of the Emergency Plan (Part 5) states that "Appendix 5 of this plan provides a topical listing of EIPs that support this plan." Appendix 5, "Implementing Procedures-Topical List," provides a one-page list of various topics and activities that will be addressed in emergency plan implementing procedures and supporting procedures. Please revise ITAAC Table 2.3-1 to include an ITAAC relating to the submission of detailed implementing procedures, consistent with RG 1.206.*

*See also, Section II.K.2, "Radiation Protection Program," which states that "[t]he RPP, in concert with the EIPs, to be developed prior to loading of nuclear fuel, includes provisions for implementing emergency exposure guidelines" (emphasis added). Consistent with the necessary ITAAC relating to the submission of detailed implementing procedures for the emergency plan (discussed above), the EIPs identified in Section II.K.2 would have to be submitted to the NRC 180 days prior to fuel load.*

**Dominion Response**

The milestone for submitting detailed implementing procedures for the emergency plan no less than 180 days prior to fuel load will be added to Table 2.3-1, ITAAC for Emergency Planning.

**Proposed COLA Revision**

PART 10, Tier 1/ITAAC Table 2.3-1, ITAAC for Emergency Planning will be revised as shown in the 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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**Table 2.3-1 ITAAC For Emergency Planning**

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
<b><u>9.0 Implementing Procedures</u></b>			
<u>10 CFR 50, Appendix E.V – No less than 180 days prior to the scheduled issuance of an operating license for a nuclear power reactor or a license to possess nuclear material, the applicant’s detailed implementing procedures for its emergency plan shall be submitted to the Commission.</u>	<u>9.1 The licensee has submitted detailed implementing procedures for its emergency plan no less than 180 days prior to fuel load.</u>	<u>9.1 An inspection will be performed to confirm that the detailed implementing procedures for the Unit 3 Emergency Plan were submitted to the NRC.</u>	<u>9.1 Each of the detailed implementing procedures for the Unit 3 Emergency Plan, as defined in Appendix 5 of the Emergency Plan, are submitted to the NRC no less than 180 days prior to fuel load.</u>