

76.

Unit 1 Initial Conditions:

- Reactor Power = 100%

Unit 1 Current Conditions:

- 1-E-0, Reactor Trip or Safety Injection has been initiated
- RCP-1A seal failure exists and the pump has been secured
- RCS leakage is 200 gpm
- CETs = 550°F
- Containment pressure = 20 psia
- Subcooled margin = 50°F
- 2 RCPs are operating
- RVLIS dynamic head range = 30%

Based on the current conditions, which one of the following correctly states:

(1) the EAL classification required to be made by the shift manager

and

(2) the maximum time for notification of the NRC after the declaration is made, in accordance with EPIP-2.02, Notification of NRC, ?

(REFERENCE PROVIDED)

- A. (1) Alert  
(2) 15 minutes
- B. (1) Alert  
(2) 1 hour
- C. (1) Site Area Emergency  
(2) 15 minutes
- D. (1) Site Area Emergency  
(2) 1 hour

77.

Current conditions:

- Unit 1 is at 100% power.
- Unit 2 is in COLD SHUTDOWN with the following charging system Alignment:
  - 2-CH-P-1B and 2-CH-P-1C control switches are in pull to lock.
- A leak has been found on 2-CH-447, Charging Pumps Cross-connect to Unit 1 Isolation Valve, and has been isolated for repairs

In accordance with Technical Specifications, which one of the following identifies:

- (1) the status of LCO 3.2, Chemical and Volume Control for both units, and
- (2) the basis for the LCO requirement?

Actions of LCO 3.2 are required on \_\_\_\_ (1) \_\_\_\_ due to the potential inability to \_\_\_\_ (2) \_\_\_\_.

- A. (1) Unit 1 but NOT Unit 2  
(2) bring the plant to COLD SHUTDOWN conditions during specific postulated fire scenarios.
- B. (1) Unit 1 but NOT Unit 2  
(2) maintain a stable RCS makeup flowpath during specific postulated seismic scenarios.
- C. (1) Unit 1 and Unit 2  
(2) bring the plant to COLD SHUTDOWN conditions during specific postulated fire scenarios.
- D. (1) Unit 1 and Unit 2.  
(2) maintain a stable RCS makeup flowpath during specific postulated seismic scenarios.

78.

While Unit 1 was at 100% Power, multiple lightning strikes caused:

- 1-RC-PT-1445 (PRZR PRESS CNTRL CH 2) to fail HIGH.
- An automatic Main Generator trip.
  
- While performing immediate operator actions of 1-E-0, REACTOR TRIP OR SAFETY INJECTION, the Reactor Operator notes the following:
  - 1-RC-PT-1444 (PRZR PRESS CNTRL CH 1) = 1910 psig and INCREASING.
  - 1-RC-PT-1455 (PRZR PRESS PROTECT CH 1) = 1930 psig and INCREASING.
  - 1-RC-PT-1456 (PRZR PRESS PROTECT CH 2) = 1920 psig and INCREASING.

Current Conditions:

- Operators have transitioned to 1-ES-0.1, "REACTOR TRIP RESPONSE," and are at the step to "CHECK PRZR PRESSURE CONTROL".
- No adjustments were made to ANY pressurizer pressure control component after the reactor trip.
- The Reactor Operator notes the following:
  - 1-RC-PT-1444 = 1990 psig and DECREASING.
  - 1-RC-PT-1455 = 2010 psig and DECREASING.
  - 1-RC-PT-1456 = 2000 psig and DECREASING.

Based upon the current conditions, (1) what is the NEXT required operator action to stop pressure from lowering, AND (2) what procedure(s) is/are required to be performed in parallel with 1-ES-0.1 to restore normal pressure control at 2235 psig?

- A. (1) CLOSE BOTH of the open PRZR Spray Valves.  
(2) Perform 1-AP-31, "INCREASING OR DECREASING RCS PRESSURE," to address BOTH the failed spray valve(s) AND the 1-RC-PT-1445 failure. Entry may also be made to 0-AP-53.00, "LOSS OF VITAL INSTRUMENTATION/CONTROLS," which will direct a transition to 1-AP-31.
- B. (1) CLOSE the open PRZR PORV(s) or associated block valve(s).  
(2) Perform 1-AP-31 to address the 1-RC-PT-1445 failure ONLY. Entry may also be made to 0-AP-53.00, which will direct a transition to 1-AP-31.
- C. (1) CLOSE BOTH of the open PRZR Spray Valves.  
(2) Perform 0-AP-53.00 to address BOTH the failed spray valve(s) AND the 1-RC-PT-1445 failure. A transition to 1-AP-31 will NOT be required.
- D. (1) CLOSE the open PRZR PORV(s) or associated block valve(s).  
(2) Perform 0-AP-53.00 to address the 1-RC-PT-1445 failure ONLY. A transition to 1-AP-31 will NOT be required.

79.

Unit 1 Initial Conditions:

- Reactor power = 100%
- A steam line break develops inside containment

Current Conditions:

- Reactor is tripped
- RCS Pressure is 1780 psia and decreasing
- Containment pressure = 17.7 psia and increasing
- Pzr Level = 25% and decreasing
- Indicated RCS Subcooling (ICCM) = 100°F
- AFW flow to each intact Steam Generator is 250 gpm.

The team has reached step 8 of 1-E-2 - CHECK IF SI FLOW SHOULD BE REDUCED

Based on the above conditions, which one of the following states: (1) which SI initiation signal will be generated if only 2 pressure switches are at the setpoint and (2) when transitioning from 1-E-2, to which procedure should the SRO transition?

- A. (1) RCS Pressure Low  
(2) 1-ES-1.1, SI TERMINATION
- B. (1) RCS Pressure Low  
(2) 1-E-1, LOSS OF REACTOR OR SECONDARY COOLANT
- C. (1) Hi CLS  
(2) 1-ES-1.1, SI TERMINATION
- D. (1) Hi CLS  
(2) 1-E-1, LOSS OF REACTOR OR SECONDARY COOLANT

80.

Initial Conditions:

- Unit 1 is experiencing a sustained Loss of All AC Power condition.
- The TDAFW pump shaft sheared on startup, and all efforts to cross-connect AFW with Unit 2 have failed.

Current Conditions:

- All emergency buses remain de-energized.
- Operators have just completed the step in ECA-0.0 to Check DC Bus Loads, and have placed both the DC emergency oil pump and the Air Side seal oil backup pump in PTL.
- Core Exit Thermocouples (CETCs) are 1202 °F and rising.
- STA reports the following Critical Safety Function Status Trees:
  - Core Cooling: RED
  - Heat Sink: RED
  - Containment: ORANGE
  - Inventory: YELLOW
  - Subcriticality: GREEN
  - Integrity: GREEN

Based upon the current conditions, what procedure is required to be used NEXT to mitigate the casualty?

- A. 1-SACRG-1, SEVERE ACCIDENT CONTROL ROOM GUIDELINE INITIAL RESPONSE.
- B. 1-ECA-0.0, LOSS OF ALL AC POWER.
- C. 1-FR-H.1, RESPONSE TO LOSS OF SECONDARY HEAT SINK.
- D. 1-FR-C.1, RESPONSE TO INADEQUATE CORE COOLING.

81.

Unit 1 initial conditions:

- A large break LOCA occurred.
- The crew transitioned to 1-ES-1.3, Transfer to Cold Leg Recirculation.

Current conditions:

- RWST level is 12% and dropping.
- Recirc Mode Transfer (RMT) switches have been verified in the "RMT" position.
- Amps and flow indications are oscillating on "A" and "B" LHSI pumps:
- Containment sump level is 54 inches.
- Crew has entered 1-ES-1.3, Attachment 1, Containment Sump Screen Blockage - Contingency Actions.

Based on current conditions, which one of the following describes the actions as required by Attachment 1 of 1-ES-1.3?

- A. Trip both LHSI pumps, cross-tie Unit 1 charging system with Unit 2 RWST and return to the procedure step in effect of 1-ES-1.3.
- B. Trip one LHSI pump, cross-tie LHSI pump suction with Unit 2 RWST and return to the procedure step in effect of 1-ES-1.3.
- C. Trip both LHSI pumps, cross-tie Unit 1 charging system with Unit 2 RWST and go to ECA-1.1, Loss of Emergency Coolant Recirculation.
- D. Trip one LHSI pump, cross-tie LHSI pump suction with Unit 2 RWST and go to ECA-1.1, Loss of Emergency Coolant Recirculation.

82.

Unit 1 initial conditions:

- The reactor failed to trip after receiving a trip signal
- SRO transitioned from 1-E-0, REACTOR TRIP OR SAFETY INJECTION, to 1-FR-S.1, RESPONSE TO NUCLEAR POWER GENERATION/ATWS.
- Reactor Power = 23% decreasing

Current plant conditions:

- Emergency Boration Initiated
- Reactor power = 3% decreasing
- Intermediate range channels indicate negative SUR
- Operators are verifying the reactor subcritical at the end of 1-FR-S.1

Based on the current plant conditions, which one of the following states (1) the emergency boration guidance in 1-FR-S.1, and (2) the next correct procedure transition as directed by 1-FR-S.1?

- A. 1) Boration should continue. Obtaining adequate shutdown margin is not required prior to any procedure transition.  
2) Return to 1-E-0.
- B. 1) Boration should continue. Obtaining adequate shutdown margin is not required prior to any procedure transition.  
2) Remain in 1-FR-S.1, and initiate Attachment 1, VERIFYING APPLICABLE STEPS OF 1-E-0.
- C. 1) Obtaining adequate shutdown margin is required prior to any procedure transition.  
2) Return to 1-E-0.
- D. 1) Obtaining adequate shutdown margin is required prior to any procedure transition.  
2) Remain in 1-FR-S.1, and initiate Attachment 1, VERIFYING APPLICABLE STEPS OF 1-E-0.

83.

The following sequence of events occurred on Unit 1:

- Time = 1400. Reactor Power is  $10^{-8}$  Amps and stable for taking critical data.
- Time = 1401. IR N-35 has failed.
- Time = 1402. Reactor Operator reports N-35 Control Power AND Instrument Power fuses are blown.
- Time = 1403. Reactor Power is  $10^{-8}$  Amps and stable.

Based on the given sequence of events, what offsite (i.e., external to Surry) notifications are required in accordance with VPAP-2802, "Notifications and Reports?"

Consider that all required internal notifications (i.e. to operations, engineering, and station management, etc.) are, or will be, made.

(REFERENCES PROVIDED)

	<u>One hour or less External Notifications</u>	<u>Greater than one hour External Notifications</u>
A.	None required	None required
B.	None required	Notification(s) required
C.	Notification(s) required	Notification(s) required
D.	Notification(s) required	None required



84.

Unit 1 current conditions:

- A steam generator (SG) tube leak exists on 'A' SG.
- The reactor is tripped.
- SI is not required.
- The crew has initiated 1-AP-24.01, Large Steam Generator Tube Leak.

Which one of the following completes the statements below concerning the tube leak on 'A' SG?

In accordance with 1-AP-24.01, SG level is required to be greater than \_\_\_\_\_ (1) \_\_\_\_\_ before stopping feed to the leaking SG AND Tave is required to be less than \_\_\_\_\_ (2) \_\_\_\_\_ before closing the associated main steam trip valve on the leaking SG.

- A. (1) 12% Narrow Range  
(2) 543°F
- B. (1) 12% Narrow Range  
(2) 547°F
- C. (1) 22% Narrow Range  
(2) 543°F
- D. (1) 22% Narrow Range  
(2) 547°F

85.

Unit 1 conditions:

- A LOCA has occurred
- The crew is performing Step 4 of 1-ES-1.1, SI TERMINATION, which requires the operators to stop all but one charging pump and place them in AUTO.
- With only one charging pump now running, RCS pressure begins to decrease.

Based on the above conditions, which one of the following states the required action (if any) and the correct procedure implementation?

- A. Manually reinitiate SI and transition to 1-E-0, REACTOR TRIP OR SAFETY INJECTION.
- B. Manually restart a charging pump and monitor RCS pressure while continuing in 1-ES-1.1, SI TERMINATION.
- C. Transition to 1-ES-1.2, POST LOCA COOLDOWN AND DEPRESSURIZATION.
- D. Continue in 1-ES-1.1, SI TERMINATION, to isolate HHSI to the cold legs, restart of a charging pump is not required.

86.

Initial conditions:

- Both units are at 100% power.
- The crew entered 1-AP-8.00, Loss of Normal Charging Flow
- Gas binding is suspected on the Unit 1 charging pumps.
- Charging and letdown have been secured on Unit 1.
- Venting of the charging pumps was attempted, but was unsuccessful.

Current conditions:

- Pressurizer level is 18% and dropping.

Based on the current conditions and in accordance with 1-AP-8.00, which one of the following describes:

- (1) the reactor trip requirements for both units, and
- (2) whether performance of Attachment 3, Charging Pump Cross-Connect, of 1-AP-8.00 is required?

- A. (1) A reactor trip is required on Unit 1. A trip of Unit 2 reactor is not required.  
(2) Performance of Attachment 3 is required.
- B. (1) A reactor trip is required on Unit 1 and Unit 2.  
(2) Performance of Attachment 3 is required.
- C. (1) A reactor trip is required on Unit 1. A trip of Unit 2 reactor is not required.  
(2) Performance of Attachment 3 is NOT required.
- D. (1) A reactor trip is required on Unit 1 and Unit 2.  
(2) Performance of Attachment 3 is NOT required.

87.

Unit 1 initial conditions:

- The Residual Heat Removal system is in service.
- At 10:03 A.M., a spurious Safety Injection (SI) actuation occurred on both trains of SI.
- The crew entered 1-AP-10.20, Response to Spurious Safety Injection with RCS Temperature Less Than 350°F.

Current conditions (10:05 A.M.):

- The SI Reset pushbuttons have been depressed on both trains.
- 1A-F3, SI INITIATED TRAIN A, is lit.
- A field operator has been sent to open the DC breaker for SI Train 'A'.

Based on the current conditions, which one of the following identifies...

- (1) the charging pump(s) feeding the reactor IMMEDIATELY after the SI initiation, and
- (2) the required procedural transition in accordance with 1-AP-10.20?

- A. (1) One charging pump.  
(2) Exit 1-AP-10.20 and Go to 1-AP-10.19, Resetting Safety Injection.
- B. (1) Three charging pumps.  
(2) Exit 1-AP-10.20 and Go to 1-AP-10.19, Resetting Safety Injection.
- C. (1) One charging pump.  
(2) Initiate 1-AP-10.19, Resetting Safety Injection and continue performing 1-AP-10.20.
- D. (1) Three charging pumps.  
(2) Initiate 1-AP-10.19, Resetting Safety Injection and continue performing 1-AP-10.20.

88.

Unit 1 initial conditions:

- Reactor power = 100%
- RCS pressure = 1900 psig decreasing rapidly

Current Conditions:

- Containment pressure = 24 psia (maximum) decreasing
- RCS pressure = 300 psig decreasing
- RWST level = 18% decreasing
- 1-E-1 LOSS OF REACTOR OR SECONDARY COOLANT in progress

Based on the above conditions, which one of the following states (1) the minimum operating containment spray pumps required to be operating as defined in FSAR Chapter 6, and (2) to what procedure 1-E-1 directs you to transition?

- A. (1) One  
(2) 1-ES-1.2, POST LOCA COOLDOWN AND DEPRESSURIZATION
- B. (1) One  
(2) 1-ES-1.3, TRANSFER TO COLD LEG RECIRCULATION
- C. (1) Two  
(2) 1-ES-1.2, POST LOCA COOLDOWN AND DEPRESSURIZATION
- D. (1) Two  
(2) 1-ES-1.3, TRANSFER TO COLD LEG RECIRCULATION

89.

Unit 2 initial conditions:

- A loss of offsite power has occurred.
- The crew has entered 2-E-0
- Emergency diesel generators (EDG) #2 and #3 have started and tied to their respective emergency buses.

Current conditions:

- 2-EP-BKR-25J3, EDG #3 Emergency Supply breaker has tripped.
- The following alarms are lit on annunciator panel
  - 0-VSP-B5 – EMERG GEN 3 TRBL
  - 0-VSP-A5 – EMERG GEN 3 DIFF
  - 2K-G4 – 4KV EMERG BUS EMERG SUP AUTO TRIP
- The crew entered 0-AP-17.05, EDG 3 – Emergency Operations.
- 14 minutes later the #3 EDG was identified as being shutdown.

Based on these current conditions, which one of the following identifies (1) the FIRST attachment to be performed in accordance with 0-AP-17.05, and (2) the condition that tripped breaker 2-EP-BKR-25J3?

- A. (1) Attachment 1, Auxiliary Trip Relay Actuation - Contingency Actions.  
(2) Field voltage was lost to EDG #3.
- B. (1) Attachment 1, Auxiliary Trip Relay Actuation - Contingency Actions.  
(2) EDG #3 differential lockout relay actuated.
- C. (1) Attachment 3, Stripping the 2J Bus.  
(2) Field voltage was lost to EDG #3.
- D. (1) Attachment 3, Stripping the 2J Bus.  
(2) EDG #3 differential lockout relay actuated.

90.

Unit 1 Current Conditions:

- Reactor Power is 35%
- An Instrument Air Dryer malfunction occurs
- Operators have attempted, but could not bypass the instrument air dryer
- Instrument Air Pressure is 45 psig and decreasing.
- Operators have just started taking actions in 1B-E6, IA LO HDR PRESS/IA COMPR 1 TBL

Based on the current conditions, which one of the following 1) states the correct procedures to use to address the reduced Instrument Air Pressure, and 2) following the reactor trip whether or not a four hour notification is required in accordance with VPAP-2802, Notifications and Reports.

(REFERENCE PROVIDED)

- A. (1) Perform AP-40.00, "Non-recoverable Loss of Instrument Air," in conjunction with the EOP network of procedures.  
(2) Four hour notification is required.
- B. (1) Do NOT perform AP-40.00, "Non-recoverable Loss of Instrument Air," in conjunction with the EOP network of procedures.  
(2) Four hour notification is required.
- C. (1) Perform AP-40.00, "Non-recoverable Loss of Instrument Air," in conjunction with the EOP network of procedures.  
(2) Four hour notification is NOT required.
- D. (1) Do NOT perform AP-40.00, "Non-recoverable Loss of Instrument Air," in conjunction with the EOP network of procedures.  
(2) Four hour notification is NOT required.

91.

The following sequence of events occurs on Unit 1:

- Time = 1800. During a power increase, the unit stabilizes power at 85% to perform a calorimetric. The delta flux target is 0.0%. Delta flux readings have remained in the target band for the past 48 hours.
- Time = 1801. A rod control circuit malfunction causes rods to insert.
- Time = 1802. Rod motion is stopped.

	Delta Flux	NI 41	NI 42	NI 43	NI 44
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- Time = 1803	-13.0%	85%	84%	85%	86%
- Time = 1817	-13.0%	85%	84%	85%	86%
- Time = 1837	-10.0%	85%	84%	85%	86%
- Time = 1905	-6.0%	85%	84%	85%	86%
- Time = 1910	-5.0%	85%	84%	85%	86%

Based on the given sequence of events, at time 1911, which one of the following answers (1) if reactor power is allowed to be raised above 90% in accordance with Technical Specification 3.12, CONTROL ROD ASSEMBLIES AND POWER DISTRIBUTION LIMITS, AND (2) the reason(s) for the above answer, in accordance with TS 3.12 BASIS?

(REFERENCE PROVIDED)

- A. (1) No.  
(2) Radial Xenon distribution in the core has been affected to an extent that reactor power reduction is required and a subsequent power range high flux trip setpoint reduction to minimize the effects of xenon redistribution on the radial power distribution during load changes.
- B. (1) No.  
(2) Axial Xenon distribution in the core has been affected to an extent that reactor power reduction is required and a subsequent power range high flux trip setpoint reduction to minimize the effects of xenon redistribution on the axial power distribution during load changes.
- C. (1) Yes.  
(2) Axial Xenon distribution control at less than 90% power is not as significant as axial Xenon control at full power, and allowances were made in the accident analyses (which is the basis of the Delta Flux control procedures) for heat flux peaking factors for accidents occurring at less than 90% power.
- D. (1) Yes.  
(2) Radial Xenon distribution in the core was NOT affected sufficiently to change the heat flux peaking factors which can be reached on a subsequent return to full power within the target band.



92.

Unit 1 initial conditions:

- The reactor was tripped due to a tube rupture on 'B' steam generator (SG).
- A Safety Injection (SI) initiated.
- 1-E-3, Steam Generator Tube Rupture, is being performed.
- RCS cooldown to target temperature of 495°F has been completed.

Following the cooldown plant conditions are as follows:

- 'B' SG pressure is 1020 psig and stable.
- Core Exit Thermocouples (CETC) is 490°F.
- SI has been reset.
- LHSI pumps have been reset.
- RCS subcooling is 35°F.
- Operators are evaluating RCS subcooling in accordance with 1-E-3 before continuing with RCS depressurization.

Based on the current plant conditions, which one of the following describes (1) whether a procedure transition to 1-ECA-3.1, SGTR with Loss of Reactor Coolant - Subcooled Recovery is required AND (2) the reason for the subcooling evaluation in accordance with 1-E-3?

- A. (1) Transition to 1-ECA-3.1 is required.  
(2) Subcooling cannot be assured and actions must be taken to re-establish subcooling.
- B. (1) Transition to 1-ECA-3.1 is NOT required.  
(2) Subcooling cannot be assured and actions must be taken to re-establish subcooling.
- C. (1) Transition to 1-ECA-3.1 is required.  
(2) Loss of RCS coolant from other than the tube rupture may be occurring.
- D. (1) Transition to 1-ECA-3.1 is NOT required.  
(2) Loss of RCS coolant from other than the tube rupture may be occurring.

93.

Plant Conditions:

- Plant fire protection systems were manually disabled to perform unplanned maintenance.
- The disabled fire protection systems allowed a small fire to escalate into a large fire in the MCR.
- The Unit Supervisor determines that MCR must be evacuated.
- The Auxiliary Shutdown Panel is available.

Which one of the following correctly (1) describes the entry into 0-FCA-1.00, Limiting MCR Fire, and (2) states whether EOP actions or FCA actions take precedence when conflicting guidance is encountered?

- A. (1) Directly enter 0-FCA-1.00 prior to going to 0-AP-48.00, Fire Protection - Operations Response.  
(2) EOP actions take precedence over FCA actions when conflicting guidance is encountered.
- B. (1) Directly enter 0-FCA-1.00 prior to going to 0-AP-48.00, Fire Protection - Operations Response.  
(2) FCA actions take precedence over EOP actions when conflicting guidance is encountered.
- C. (1) First enter 0-AP-48.00, Fire Protection - Operations Response, then enter 0-FCA-1.00.  
(2) EOP actions take precedence over FCA actions when conflicting guidance is encountered.
- D. (1) First enter 0-AP-48.00, Fire Protection - Operations Response, then enter 0-FCA-1.00.  
(2) FCA actions take precedence over EOP actions when conflicting guidance is encountered.

94.

A condition has occurred in the plant that requires the implementation of 10CFR-50.54(x) to protect public health and safety. Adequate time for approval exists before the action is required.

Which ONE of the following states 1) the required level of authorization prior to taking the deviating action and 2) what follow-up actions are required following the completion of the action?

- A. 1) The highest level of authority on site is required to approve the action.  
2) Notification of the NRC is required.
- B. 1) The highest level SRO licensed individual is required to approve the action.  
2) Notification of the NRC is NOT required.
- C. 1) The highest level of authority on site is required to approve the action.  
2) Notification of the NRC is NOT required.
- D. 1) The highest level SRO licensed individual is required to approve the action.  
2) Notification of the NRC is required.

95.

In accordance with 1-OP-FH-001, Controlling Procedure for Refueling, which one of the following identifies when subcriticality multiplication monitoring must be initiated during core reload?

- A. After the fourth assembly has been loaded in the core.
- B. After the sixth assembly has been loaded in the core.
- C. After the eighth assembly has been loaded in the core.
- D. After the tenth assembly has been loaded in the core.

96.

Initial Conditions:

- Unit 2 is in a refueling outage.

Current Conditions:

- The Shift Technical Advisor (STA) identifies that, due to multiple schedule changes and emergent switchyard work, there is a two-hour window that will occur several hours later on the current shift that would place the unit in a RED Shutdown Risk (SDR) condition.

Which ONE of the following states 1) whether entry into the RED SDR condition is permissible and 2) limitations or restrictions that exist for this condition?

- A. 1) Yes, entry in the RED SDR condition is allowed.  
2) The RED condition shall not exceed the duration of one shift.
- B. 1) Yes, entry in the RED SDR condition is allowed.  
2) The RED condition can exist, providing administrative controls are in place to prevent further degradation.
- C. 1) No, entry in the RED SDR condition is NOT allowed.  
2) A RED condition shall not exceed one hour, providing administrative controls are in place to prevent further degradation.
- D. 1) No, entry in the RED SDR condition is NOT allowed.  
2) The activities that would place the station in this configuration must be rescheduled.

97.

Unit 1 is in Hot Shutdown and preparations are being made to conduct an infrequently performed test to verify the time dependence of reactor coolant flow following an intentional loss of a reactor coolant pump.

The test has been classified as an ICCE (Infrequently Conducted or Complex Evolution) Category I evolution.

Which ONE of the following states

1) who is required to review and approve this ICCE procedure in accordance with OP-AA-106 (Infrequently Conducted or Complex Evolutions)

and

2) an acceptable example of the individual who meets the general selection guidance for the seniority and qualifications of the Senior Operations Manager selected to provide oversight of the test in accordance with OP-AA-106.

- A. (1) Manager - Nuclear Operations  
(2) Control Room Unit Supervisor with an active SRO license at Surry.
- B. (1) Facility Safety Review Committee  
(2) Operations manager who formerly held an SRO license at Surry.
- C. (1) Manager - Nuclear Operations  
(2) Operations manager who formerly held an SRO license at Surry.
- D. (1) Facility Safety Review Committee  
(2) Control Room Unit Supervisor with an active SRO license at Surry.

98.

Current conditions:

- Unit 1 is at full power.

Which one of the following states:

- 1) the DOSE EQUIVALENT IODINE-131 limit for RCS activity in accordance with Technical Specification 3.1.D, Maximum Reactor Coolant Activity

AND

- 2) the assumed release duration through the Main Steam Safety Valves and Atmospheric Relief Valves during the postulated steam generator tube rupture in accordance with Technical Specification bases?

- A.
  - 1) Less than or equal to 0.1  $\mu\text{Ci/cc}$ .
  - 2) 60 minutes.
- B.
  - 1) Less than or equal to 0.1  $\mu\text{Ci/cc}$ .
  - 2) 30 minutes.
- C.
  - 1) Less than or equal to 1.0  $\mu\text{Ci/cc}$
  - 2) 60 minutes.
- D.
  - 1) Less than or equal to 1.0  $\mu\text{Ci/cc}$
  - 2) 30 minutes.

99.

An event has occurred in the station and the emergency plan has been entered.

In accordance with EPIP-1.01 (Emergency Manager Controlling Procedure), The Shift Manager is required to announce:

- that he or she has assumed the Station Emergency Manager (SEM) position
- the emergency classification, the time of declaration
- AND \_\_\_\_\_ (1) \_\_\_\_\_ .

The event was a General Emergency, the initial notification of the applicable PAR \_\_\_\_\_ (2) \_\_\_\_\_ .

- A. (1) the EAL, and any pertinent upgrade criteria.  
(2) is required to be made at the same time the initial notification of the GE is made.
- B. (1) the EAL. Announcing upgrade criteria is not required by EPIP-1.01.  
(2) is required to be made at the same time the initial notification of the GE is made.
- C. (1) the EAL, and any pertinent upgrade criteria.  
(2) is NOT required to be made at the same time the initial notification of the GE is made.
- D. (1) the EAL. Announcing upgrade criteria is not required by EPIP-1.01.  
(2) is NOT required to be made at the same time the initial notification of the GE is made.



100.

The following conditions exist:

- A manual Rx trip was initiated 10 minutes ago based on AP-16.00, Excessive RCS Leakage, criteria
- Pressurizer level is off-scale low
- Pressurizer pressure is 1500 psig and decreasing
- All SG levels are 5% NR and slowly increasing
- All SG pressures are 1005 psig and stable
- All main steam line radiation monitors are reading .02 mr/hr
- MGPI Vent-Vent radiation monitor is reading 4.3 E6 cpm
- Containment pressure is 10.2 psia
- Containment sump level is 47%
- VSP-F-4, "AUX Building Sump HI Level," is illuminated
- Safeguards Area Sump high level alarm is locked in

Upon exiting E-0, which one of the following is the correct procedure transitions for the event in progress?

- A. Go to E-1 (Loss of Reactor or Secondary Coolant), ECA-1.2 (LOCA Outside Containment), then ECA-1.1 (Loss of Emergency Coolant Recirculation)
- B. Go to E-1 (Loss of Reactor or Secondary Coolant), then ECA-1.1 (Loss of Emergency Coolant Recirculation), then ECA-1.2 (LOCA Outside Containment)
- C. Go to ECA-1.1 (Loss of Emergency Coolant Recirculation), then ECA-1.2 (LOCA Outside Containment)
- D. Go to ECA-1.2 (LOCA Outside Containment), then ECA-1.1 (Loss of Emergency Coolant Recirculation)

# SRO REFERENCE MATERIAL

1. This package
2. SRO/RO Exam Package
3. EAL Matrices
4. VPAP-2802

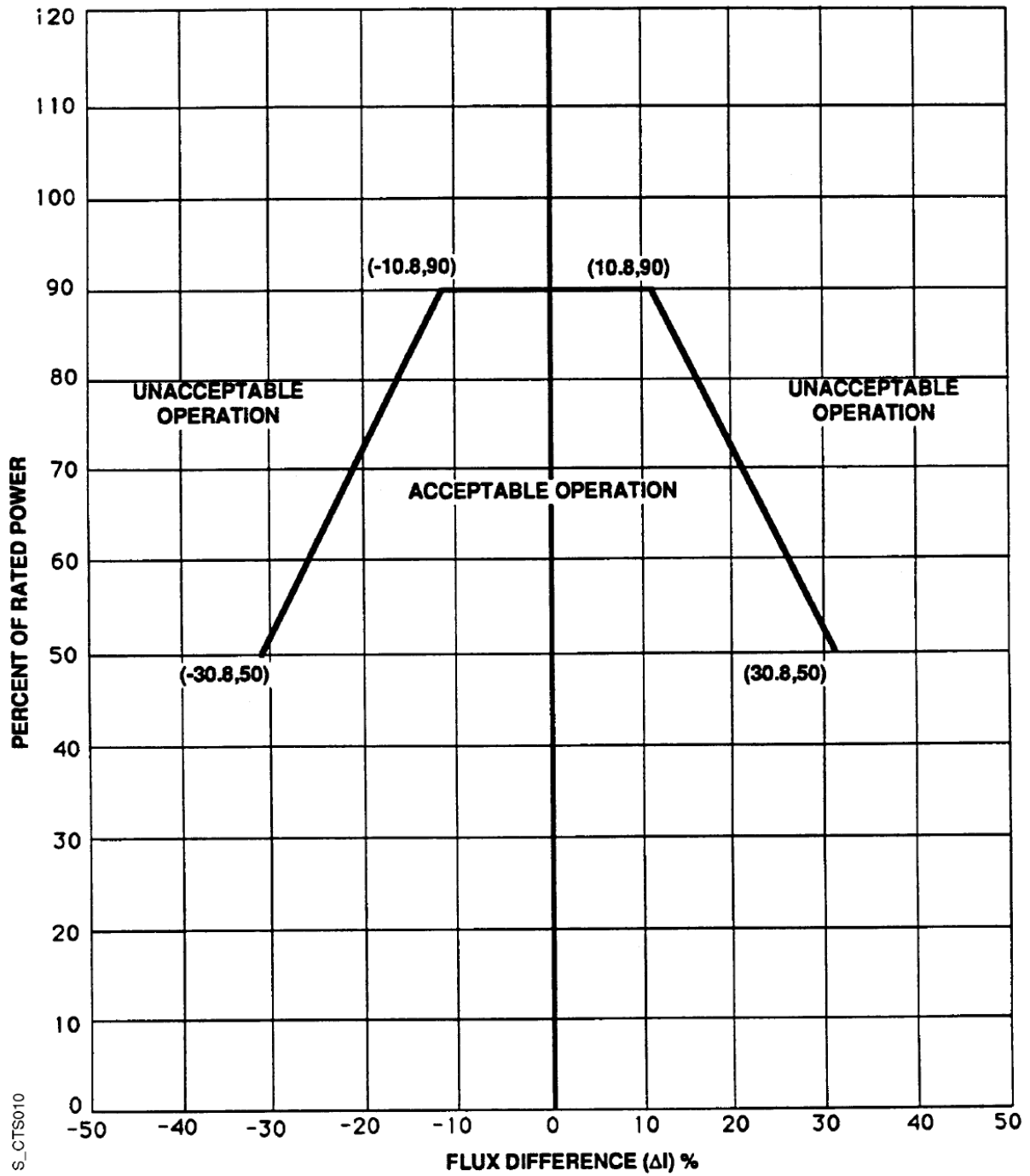


- a. At a power level greater than 90 percent of RATED POWER, if the indicated axial flux difference deviates from its target band, within 15 minutes either restore the indicated axial flux difference to within the target band or reduce the reactor power to less than 90 percent of RATED POWER.
- b. At a power level less than or equal to 90 percent of RATED POWER,
  - (1) The indicated axial flux difference may deviate from its target band for a maximum of one hour (cumulative) in any 24-hour period provided the flux difference is within the limits shown on TS Figure 3.12-3. One minute penalty is accumulated for each one minute of operation outside of the target band at power levels equal to or above 50% of RATED POWER.
  - (2) If Specification 3.12.B.4.b.(1) is violated, then the reactor power shall be reduced to less than 50% power within 30 minutes and the high neutron flux setpoint shall be reduced to less than or equal to 55% power within the next four hours.
  - (3) A power increase to a level greater than 90 percent of RATED POWER is contingent upon the indicated axial flux difference being within its target band.
  - (4) Surveillance testing of the Power Range Neutron Flux Channels may be performed pursuant to TS Table 4.1-1 provided the indicated axial flux difference is maintained within the limits of TS Figure 3.12-3. A total of 16 hours of operation may be accumulated with the axial flux difference outside of the target band during this testing without penalty deviation.
- c. At a power level less than or equal to 50 percent of RATED POWER,

- (1) The indicated axial flux difference may deviate from its target band.
  - (2) A power increase to a level greater than 50 percent of RATED POWER is contingent upon the indicated axial flux difference not being outside its target band for more than one hour accumulated penalty during the preceding 24-hour period. One half minute penalty is accumulated for each one minute of operation outside of the target band at power levels between 15% and 50% of RATED POWER.
- d. The axial flux difference limits for Specifications 3.12.B.4.a, b, and c may be suspended during the performance of physics tests provided:
- (1) The power level is maintained less than or equal to 85% of RATED POWER, and
  - (2) The limits of Specification 3.12.B.1 are maintained. The power level shall be determined to be less than or equal to 85% of RATED POWER at least once per hour during physics tests. Verification that the limits of Specification 3.12.B.1 are being met shall be demonstrated through in-core flux mapping at least once per 12 hours.

Alarms shall normally be used to indicate the deviations from the axial flux difference requirements in Specification 3.12.B.4.a and the flux difference time limits in Specifications 3.12.B.4.b and c. If the alarms are out of service temporarily, the axial flux difference shall be logged and conformance to the limits assessed every hour for the first 24 hours and half-hourly thereafter. The indicated axial flux difference for each excore channel shall be monitored at least once per 7 days when the alarm is OPERABLE and at least once per hour for the first 24 hours after restoring the alarm to OPERABLE status.

AXIAL FLUX DIFFERENCE LIMITS  
AS A FUNCTION OF RATED POWER  
SURRY POWER STATION





**Dominion®**

# Station Administrative Procedure

**Title: Notifications and Reports**

**Process / Program Owner: Director Nuclear Station Safety and Licensing**

**Procedure Number  
VPAP-2802**

**Revision Number  
34**

**Effective Date  
On File**

## **Revision Summary**

Revised to incorporate 40 CFR 82, Protection of Stratospheric Ozone, reportability instruction.

- Added 5.8.26 (under Environmental Compliance Coordinator responsibilities) - "Notifying Electric Environmental Services of the failure to repair a commercial or comfort refrigeration unit containing greater than 50 pounds of refrigerant within 30 days; see Step 6.20.2."
- Added 5.13.26 (under Director Electric Environmental Services responsibilities) - "Notifying the EPA headquarters in accordance with 40 CFR 82.166(N)(i) of the failure to repair a commercial or comfort refrigeration unit containing greater than 50 pounds of refrigerant within 30 days; see Step 6.20.2."
- Added 6.20.2, 40 CFR 82, Protection of Stratospheric Ozone.

The following changes were in response to North Anna CA 149585 (CR 352954), North Anna Environmental Program Audit:

- Added 3.1.106 - North Anna CA 149585 (CR 352954), North Anna Environmental Program Audit.
- Added 6.3.2.e.4 NOTE "Items marked with an asterisk(\*) on Attachment 1 are required to be reported to the response agencies listed in block 10 of the attachment. (**Reference 3.1.106**)"
- Revised Attachment 1, Oil or Hazardous Substance Release Report - 721973(Apr 2010) - added asterisks referenced in 6.3.2.e.4 NOTE; added block 6 - "Material Discharged (for oil spills use the codes found in the SPCC Oil Spill Report form)"; added block 12 - "If No, is there a potential for release? Yes - No"

The following changes were administrative in nature:

- 4.4 and 4.23 - changed "Nuclear Mutual Limited" to "Nuclear Electric Insurance Limited"; deleted references to "Nuclear Mutual Limited" and "NML."
- Changed "Risk Services" to "Corporate Risk Management."
- Updated 6.1.1, Notifications - added "State Department of Emergency Management—(804) 674-2400, ask for EOC Duty Officer"
- Updated USNRC phone number and address.
- Updated 6.3.3.i - added third bullet: "Louisa/Surry County Administrator."
- Revised Attachment 1, Oil or Hazardous Substance Release Report - 721973(Apr 2010) - changed "Water Quality" and "Corporate Water Quality Department" to "Electric Environmental Services."

**Approvals on File**

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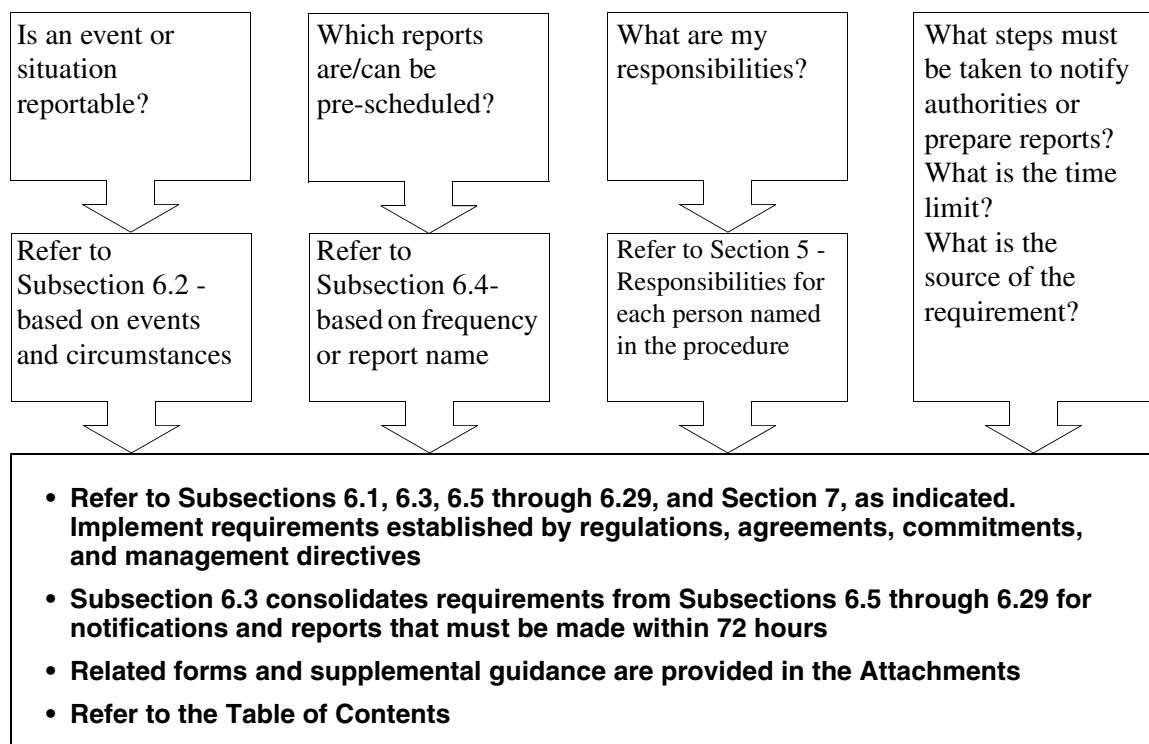
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**NOTE:** Section 6 includes a CFR Part or Section number within many of its titles. Some of the CFR titles were edited to make the format consistent for this procedure. In other cases, referenced Parts or Sections do not have titles, so titles were created for this procedure. **Do not**, therefore, rely on these titles to cite CFR Part or Section titles. CFR Titles that appear in Section 3.0 **are** cited as they appear in the CFR.

## 1.0 PURPOSE

This procedure defines responsibilities, establishes requirements, and provides instructions to implement notification, report, and posting requirements applicable to Station activities, situations, and events.

This procedure is structured to guide you to specific information based on what you need to know for specific situations. Figure 1 suggests ways to find certain information quickly.



**Figure 1**  
**Optimal Use of this Procedure**

## **2.0 SCOPE**

- 2.1** This procedure applies to personnel with duties associated with the Station. Unless specifically indicated otherwise, references to the Station include the Independent Spent Fuel Storage Installation (ISFSI).
- 2.2** This procedure does **not** apply to:
- Actions controlled by Emergency Plan Implementing Procedures (EPIPs)
  - Notifications and reports associated with non-nuclear-related insurance
  - Internal Dominion notifications or reports that are not directly associated with external notifications or reports
  - Reporting and posting requirements of nonregulatory agencies such as the Virginia Employment Commission, Internal Revenue Service, or Social Security Administration
- 2.3** Due to the staggered implementation of the Central Reporting System (CRS) for the Dominion nuclear fleet, the nuclear power station term for its station's corrective action system item: Plant Issue, Condition Report and/or Action Request are all being replaced by the CRS term, Condition Report. A Condition Report (CR) is the document used to identify Significant Conditions Adverse to Quality, Conditions Adverse to Quality, Adverse Trends, and other issues that do not meet expectations of management. The terms Action Request, Plant Issue (Deviation) and Deviation Report are synonymous with the term Condition Report. This statement is applicable to any procedure where the terms Deviation Report, DR, Plant Issue, or PI appear. Numbered items generated by the station's corrective action system prior to CRS implementation are not changed.

## **3.0 REFERENCES/COMMITMENT DOCUMENTS**

### **3.1 References**

- 3.1.1 10 CFR, Energy
- 3.1.2 18 CFR 12, Safety of Water Power Projects and Project Works
- 3.1.3 29 CFR 1900, Occupational Safety and Health Administration, Department of Labor
- 3.1.4 40 CFR, Protection of Environment
- 3.1.5 49 CFR, Transportation (Subchapter C—Hazardous Materials Regulations)
- 3.1.6 Emergency Planning and Community Right-To-Know Act of 1986, PL99-499
- 3.1.7 Code of Virginia § 10.1-1429, Notice of Release of Hazardous Substance
- 3.1.8 Code of Virginia § 62.1-44.34:19, Reporting of Discharge

- 3.1.9 Virginia State Water Control Board Regulation 9 VAC 25-31-10 § I, Reporting Requirements
- 3.1.10 Virginia State Water Control Board Regulation 9 VAC 25-90-10, Oil Discharge Contingency Plans and Administrative Fees for Approval
- 3.1.11 Virginia State Water Control Board Regulation 9 VAC 25-200, Water Withdrawal Reporting
- 3.1.12 NRC Regulatory Guide 1.16, Reporting of Operating Information—Appendix A: Technical Specifications, Revision 4, August 1975
- 3.1.13 NRC Regulatory Guide 1.21, Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants, Revision 1, June 1974
- 3.1.14 NRC Regulatory Guide 1.97, Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident, Revision 3, May 1983
- 3.1.15 NRC Regulatory Guide 5.62, Reporting of Safeguards Events, Revision 1, November 1987
- 3.1.16 NRC Regulatory Guide 10.1, Compilation of Reporting Requirements for Persons Subject to NRC Regulations, Revision 4, October 1981
- 3.1.17 NRC Radiological Assessment Branch, Branch Technical Position: An Acceptable Radiological Environmental Monitoring Program, Revision 1, November 1979
- 3.1.18 North Anna Power Station Technical Specifications
- 3.1.19 North Anna Independent Spent Fuel Storage Installation License and Technical Specifications
- 3.1.20 Surry Power Station Units 1 and 2 Operating Licenses and Technical Specifications
- 3.1.21 Surry Independent Spent Fuel Storage Installation License and Technical Specifications
- 3.1.22 North Anna Power Station VPDES Permit No. VA0052451
- 3.1.23 Surry Power Station VPDES Permit No. VA0004090
- 3.1.24 North Anna Power Station Virginia Air Pollution Control Board Registration, No. 40726, February 28, 1983
- 3.1.25 Surry Power Station Virginia Air Pollution Control Board Registration, No. 50336, August 15, 1988
- 3.1.26 Topical Report, Quality Assurance Program
- 3.1.27 North Anna Power Station Emergency Plan
- 3.1.28 North Anna Hydroelectric Project Emergency Action Plan

- 3.1.29 Surry Power Station Emergency Plan
- 3.1.30 North Anna Power Station Updated Final Safety Analysis Report
- 3.1.31 North Anna Independent Spent Fuel Storage Installation Safety Analysis Report
- 3.1.32 Surry Power Station Updated Final Safety Analysis Report
- 3.1.33 Surry Independent Spent Fuel Storage Installation Safety Analysis Report
- 3.1.34 Nuclear Electric Insurance Limited Policies
- 3.1.35 Inservice Inspection Manual
- 3.1.36 Nuclear Loss Prevention Standards Manual
- 3.1.37 Oil Discharge Contingency Plan, and Appendix I and Appendix L
- 3.1.38 Virginia Power Technical Report No. PE-0013, North Anna Power Station Response to Regulatory Guide 1.97
- 3.1.39 Virginia Power Technical Report No. PE-0014, Surry Power Station Response to Regulatory Guide 1.97
- 3.1.40 EPIP-1.01, Emergency Manager Controlling Procedure
- 3.1.41 EPIP-2.01, Notification of State and Local Governments
- 3.1.42 EPIP-2.02, Notification of NRC
- 3.1.43 LI-AA-101, License Basis Document Changes Process
- 3.1.44 LI-AA-101-1001, License Basis Document Changes Process Reference
- 3.1.45 LI-AA-110, Commitment Management
- 3.1.46 LI-AA-200, NRC Licensing Correspondence
- 3.1.47 LI-AA-301, Implementation of 10 CFR 21, Reporting of Defects and Noncompliance
- 3.1.48 LI-AA-500, NRC/INPO/WANO Performance Indicator and MOR Reporting
- 3.1.49 MS-AA-WHR-401, Receiving
- 3.1.50 MS-AA-WHS-131, Storage and Handling
- 3.1.51 OP-AA-100, Conduct of Operations
- 3.1.52 OP-AA-102, Operability Determination
- 3.1.53 OP-AP-105, Post Trip Review
- 3.1.54 PI-AA-100-1007, Operating Experience Program
- 3.1.55 PI-AA-200, Corrective Action
- 3.1.56 VPAP-0301, Design Change Process
- 3.1.57 VPAP-0602, Vendor Technical Manual Control
- 3.1.58 VPAP-1406, Nuclear Material Control

- 3.1.59 VPAP-1901, Industrial Safety and Health
- 3.1.60 VPAP-2101, Radiation Protection Program
- 3.1.61 VPAP-2103N, Offsite Dose Calculation Manual (North Anna), VPAP-2103S, Offsite Dose Calculation Manual (Surry)
- 3.1.62 VPAP-2104, Radioactive Waste Process Control Program (PCP)
- 3.1.63 VPAP-2202, Control of Chemicals and Hazardous Substances
- 3.1.64 VPAP-2203, Oil Spill Prevention, Control, and Countermeasures (SPCC) Plan
- 3.1.65 VPAP-2602, Safety Parameter Display System (SPDS) (Surry)
- 3.1.66 VPAP-2606, Safety Parameter Display System (SPDS) (North Anna)
- 3.1.67 VPAP-2703, Control Room Simulator
- 3.1.68 VPAP-2803, UFSAR and ISFSI SAR Management
- 3.1.69 Emergency Telephone Directory
- 3.1.70 FEMA Guidance Memorandum PR-1, Policy on NUREG-0654/FEMA-REP-1 and 44 CFR 350 Periodic Requirements, October 1, 1985
- 3.1.71 NRC Generic Letter 91-02, Subject: Reporting Mishaps Involving LLW Forms Prepared for Disposal, December 28, 1990
- 3.1.72 NRC Generic Letter 91-03, Reporting of Safeguards Events
- 3.1.73 NRC IE Information Notice No. 79-30, Reporting of Defects & Noncompliances, 10 CFR 21
- 3.1.74 NRC Information Notice No. 89-89, Event Notification Worksheets, December 26, 1989
- 3.1.75 NUREG-0302, Remarks Presented (Questions/Answers Discussed) at Public Regional Meetings to Discuss Regulations (10 CFR Part 21) for Reporting of Defects and Noncompliance, July 12-26, 1977, Revision 1, October 1977
- 3.1.76 NUREG-0472, Standard Radiological Effluent Technical Specifications for Pressurized Water Reactors, Revision 3, March 1982
- 3.1.77 NUREG-1022, Event Reporting Guidelines 10 CFR 50.72 and 50.73, Revision 2, October 2000
- 3.1.78 NUREG-1304, Reporting of Safeguards Events, February 1988
- 3.1.79 NUREG/BR-0006, Instructions for Completing Nuclear Material Transaction Reports and Concise Note Forms, Revision 4, February 1, 2000
- 3.1.80 NUREG/BR-0007, Instructions for Completing Material Balance Report and Physical Inventory Listing, Revision 3, February 1, 2000

- 3.1.81 ANSI/IEEE C57.104-1978, Guide for Detection and Determination of Generated Gases in Oil-Immersed Transformers and Their Relation to the Serviceability of the Equipment
- 3.1.82 ASTM E 185, Conducting Surveillance Tests for Light-Water Cooled Nuclear Power Reactor Vessels, E 706 (1F)
- 3.1.83 Westinghouse letter to NRC, Serial No. NS-CE-1749, April 6, 1978
- 3.1.84 Varga, Steven A., NRC, to Stewart, W. L., Virginia Electric and Power Company, March 11, 1983
- 3.1.85 Slayton, A. E., Jr., State Office of Emergency and Energy Services, letter to Stewart, W. L., Virginia Power, April 17, 1984
- 3.1.86 Speck, Samuel W., FEMA, letter to Regional Directors, Subject: Guidance Memorandum PR-1, Policy on FEMA Guidance Memorandum PR-1, Policy on NUREG-0654/FEMA-REP-1 and 44 CFR 350 Periodic Requirements, October 1, 1985 and 44 CFR 350 Periodic Requirements, October 4, 1985
- 3.1.87 Stewart, W. L., to Distribution, Subject: NRC Correspondence, October 8, 1985
- 3.1.88 Rosbe, William L., and Amy R. Chester, Hunton and Williams, Memorandum to Marshall, B. M., Virginia Power, Subject: Summary of Federal and Virginia Reporting Requirements for a Release of a Hazardous Substance or Oil (and new SARA Reporting Requirements), January 9, 1987
- 3.1.89 Engle, Leon, NRC, letter to Stewart, W. L., Virginia Electric and Power Company, Subject: Projected Values of Material Properties For Fracture Toughness Requirements For Protection Against Pressurized Thermal Shock Events, May 29, 1987
- 3.1.90 Engle, Leon B., NRC, letter to Cruden, D. S., Virginia Electric and Power Company, Subject: Compliance with ATWS Rule, 10 CFR 50.62, Surry Power Plant, Units No. 1 and No. 2 (Surry 1 & 2) and North Anna Power Station, Units No. 1 and No. 2 (NA-1&2) (TAC Nos. 59147, 59148, 59117 and 59118), May 26, 1988
- 3.1.91 Hegner, J. D., to Kemp, P. A., Subject: FERC Dam Reporting Requirements, September 10, 1991
- 3.1.92 NEI 99-02, Regulatory Assessment Performance Indicator Guideline
- 3.1.93 Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates, AIF/NESP-036, 1986
- 3.1.94 Regulatory Guide 1.159, Assuring the Availability of Funds for Decommissioning Nuclear Reactors, dated August 1990

- 3.1.95 Edison, Gordon E. Sr., NRC, letter (Serial number 01-040) to Christian, David A., Virginia Electric and Power Company, Subject: North Anna Power Station, Units 1 and 2 and Independent Spent Fuel Storage Installation (ISFSI), and Surry Power Station, Units 1 and 2 and ISFSI - Approval of proposed variation in reporting schedule pursuant to 10 CFR 72.76(a) and 74.13(a)(1) (TAC numbers MB0328, MB0329, MB0330, and MB0331), December 29, 2000
- 3.1.96 Code of Virginia § 10.1-2300, Virginia Antiquities Act
- 3.1.97 ASME Code Case N-532, Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission
- 3.1.98 NEI 94-01, Revision 0, dated July 26, 1995, Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J
- 3.1.99 NRC Regulatory Guide 1.163, Performance-Based Containment Leak Test Program dated September 1995
- 3.1.100 Revised NRC Order EA-03-009, Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors, dated February 20, 2004
- 3.1.101 NEI 07-07, Industry Ground Water Protection Initiative - Final Guidance Document
- 3.1.102 Engineering Transmittal ET-NAF-08-0034, Applicability of 10 CFR to NUHOMS Important to Safety Components Classified NSQ
- 3.1.103 NOD Audit Finding 07-12-01C
- 3.1.104 North Anna CR 324829
- 3.1.105 North Anna Power Station Waterworks Operation Permit No. 2109600 and North Anna Power Station Waterworks Operation Permit No. 2109610
- 3.1.106 North Anna CA 149585 (CR 352954), North Anna Environmental Program Audit

### **3.2 Commitment Documents**

- 3.2.1 QA Audit No. N-84-25, Finding No. 3
- 3.2.2 QA Audit No. N-86-03, Finding No. 01
- 3.2.3 QA Audit No. S89-14, Finding S89-14-05
- 3.2.4 Stewart, W. L., Virginia Electric and Power Company, to Denton, Harold R. (Attn: Varga, Steven A.), U.S. Nuclear Regulatory Commission, Subject: Reporting Related to NPDES Permits: Surry Power Station Unit Nos. 1 and 2, March 28, 1983
- 3.2.5 Grace, J. Nelson, U.S. Nuclear Regulatory Commission, to Stewart, W. L., Virginia Electric and Power Company, Subject: Report Nos. 50-280/86-23, 50-281/86-23, 50-338/86-22, and 50-339/86-22, December 11, 1986



- 3.2.6 Cruden, D. S., Virginia Electric and Power Company, to U.S. Nuclear Regulatory Commission, Subject: North Anna Power Station Units 1 and 2, NRC Inspection Report Nos. 50-338/87-38 and 50-339/87-38, Reply to a Notice of Violation, April 21, 1988, Serial No. 88-136A
- 3.2.7 NRC Generic Letter 91-02, Reporting Mishaps Involving LLW Forms Prepared for Disposal, December 28, 1990
- 3.2.8 Urquhart, George O'N., Commonwealth of Virginia Department of Emergency Services, to Cox, F. M., Virginia Power, February 3, 1988
- 3.2.9 Cartwright, W. R., to Slayton, Addison E., State Department of Emergency Services, December 1, 1989
- 3.2.10 Lough, W. Timothy, Ph.D., Commonwealth of Virginia State Corporation Commission, to Cunningham, John E., Virginia Power, December 8, 1989
- 3.2.11 Edmonds, Larry L., to SNSOC Secretary, Subject: Status of Corrective Action in Response to DR 89-2128, January 2, 1990
- 3.2.12 Berkow, Herbert N., NRC, to Stewart, W. L., Subject: Surry Units 1 and 2 and North Anna Units 1 and 2 - 10 CFR 50.72 Reporting Requirements, June 3, 1991
- 3.2.13 Crisp, Robert W., FERC, to Harrell, E. Wayne, June 18, 1991
- 3.2.14 Crisp, Robert W., FERC, to Cartwright, W. R., August 2, 1991
- 3.2.15 Crisp, Robert W., FERC, to Harrell, E. Wayne, August 20, 1991
- 3.2.16 O'Hanlon, J.P., Virginia Power, to Slayton, Addison E., Virginia Department of Emergency Services, February 4, 1994
- 3.2.17 Surry Deviation Report S-97-1634, Fire Protection Notification
- 3.2.18 CTS 02-97-2120 Item 001, DR N-96-2528, North Anna, 10 CFR 71.95 Criteria
- 3.2.19 CTS 02-97-2196 Item 001, DR N-97-0915, North Anna, AMSAC Operability Criteria
- 3.2.20 Site Specific Decommissioning Cost Studies update frequency has been established in North Carolina per a North Carolina Commission Final Order (at least every five years). In Virginia, rate case testimony committed to an update every four years.
- 3.2.21 Deviation S-1999-2415, Four-hour Notification Requirement Following Engineered Safety Feature (ESF) Actuation
- 3.2.22 S-2001-1779-R2, Emergency Telecommunications System (ETS) Functionality
- 3.2.23 N-2002-0047, Control of General License Devices
- 3.2.24 Surry Licensing Issue 51027, AMSAC Inoperability
- 3.2.25 Plant Issue (Deviation) S-2002-3048-R2, AMSAC Inoperability
- 3.2.26 Plant Issue (Deviation) S-2004-1119, Oil Spill Reporting

- 3.2.27 North Anna Technical Specifications Amendment Numbers 239 and 220/Surry Technical Specifications Amendment Numbers 240 and 239, Elimination of Requirements to Provide Monthly Operating Reports and Annual Occupational Radiation Exposure Reports, Issued March 22, 2005
- 3.2.28 Surry Technical Specification Amendment Numbers 244/243, Administrative Controls Changes (to support Consolidated QA Program); Plant Issues (Licensing Commitments) S-2004-3015 and S-2004-4898
- 3.2.29 Plant Issue (Licensing Commitment) S-2005-1715, VPP Annual Self-assessment Reporting Requirement
- 3.2.30 Surry Technical Specification Amendment Numbers 247/246, Revision of Accident Monitoring Instrumentation Listing, Allowed Outage Times, Requirements, and Surveillances; Plant Issue (Licensing Commitment) S-2005-3380

## **4.0 DEFINITIONS**

### **4.1 Actuation, Component or System**

A change in the state of a component or system (e.g., valve opens or closes, motor or pump starts, safety injection, auxiliary feedwater initiation).

### **4.2 Actuation, Invalid**

An invalid actuation is one that does not meet the criteria for being valid and are initiated for reasons other than to mitigate the consequences of an event (e.g., as part of a planned evolution, with the system properly removed from service, or after the safety function has already been completed). Invalid actuations include instances where instrument drift, spurious signals, human error, or other invalid signals caused actuation (e.g., jarring a cabinet, an error in the use of jumpers or lifted leads, an error in the actuation of switches or controls, equipment failure, radio frequency interference).

### **4.3 Actuation, Valid**

Actuation resulting from an intentional manual initiation or from a signal that was initiated in response to actual plant conditions or parameters satisfying the requirements for initiation, unless part of a preplanned test.

**4.4 Adverse Condition (Nuclear Electric Insurance Limited)**

- A condition which, if allowed to continue uncorrected, could:
- Cause physical damage in excess of \$500,000, or
- Result in an outage longer than three weeks

**or**

- Transformer tests indicate:
  - Any gas that exceeds ANSI/IEEE C57.104-1978 probability norms by 10 percent or more
  - Total dissolved combustible gases greater than 700 ppm

**4.5 Basic Component (10 CFR 21)**

4.5.1 A plant structure, system, component, or part thereof that affects its safety function necessary to assure the:

- Integrity of the reactor coolant pressure boundary
- Capability to shut down the reactor and maintain it in a safe shutdown condition, or
- Capability to prevent or mitigate the consequences of an accident which could result in potential off-site exposures comparable to those referred to in 10 CFR 50.67(b)(2) or 10 CFR 100.11

Basic component includes safety-related design, analysis, inspection, testing, fabrication, replacement parts, or consulting services (whether performed by the component supplier or others) that are associated with component hardware.

Commercial grade items are not basic components until after dedication (i.e., when dedicated for use as a basic component).

4.5.2 Basic Component - Independent Spent Fuel Storage Installation (ISFSI) - When applied to 10 CFR 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste", basic component means a structure, system, or component, or part thereof that affects their safety function, that is directly procured by the licensee of a facility or activity subject to the regulations in 10 CFR 21 and in which a defect or failure to comply with any applicable regulation in 10 CFR Chapter I, order, or license issued by the Commission could create a substantial safety hazard.

ISFSI NUHOMS NSQ items which are vendor Transnuclear Quality Category B items (Reference 3.1.102) are basic components which require the application of 10 CFR 21. (Reference 3.1.103).

**4.6 Bypassing (VPDES Permit)**

Intentional diversion of waste streams from any portion of a treatment works.

**4.7 Byproduct Material**

Any radioactive material (except special nuclear material) yielded in or made radioactive by exposure to the radiation incident to the process of producing or using special nuclear material.

**4.8 Condition That Affects the Safety of a Project (18 CFR 12.10)**

Any condition, event, or action at Lake Anna Dam which might compromise the safety, stability, or integrity of any project work, or the ability of any project work to function safely for its intended purposes, including navigation, water power development, or other beneficial public uses; or which might otherwise adversely affect life, health, or property. Conditions affecting the safety of a project include, but are not limited to:

- Unscheduled rapid draw-down of impounded water
- Failure of any facility that controls the release or storage of impounded water, such as a gate, a valve, or an emergency power supply
- Failure or unusual movement, subsidence, or settlement of any part of the dam or the adjacent areas
- Unusual concrete deterioration or cracking, including development of new cracks or the lengthening or widening of existing cracks
- Piping, slides, or settlements of materials in any dam, abutment, dike, or embankment
- Significant slides or settlements of materials in areas adjacent to the lake
- Significant damage to slope protection
- Unusual instrumentation readings
- New seepage or leakage or significant gradual increase in pre-existing seepage or leakage
- Sinkholes
- Significant instances of vandalism or sabotage
- Natural disasters, such as floods or earthquakes
- Any other signs of instability of any project work

**4.9 Cut-off Level (10 CFR 26)**

The value set for designating a fitness for duty test result as positive.

**4.10 Defect (10 CFR 21)**

- A deviation (see Subsection 4.11) in a basic component delivered to the Station for use, if, on the basis of evaluation, the deviation could create a substantial safety hazard
- or**
- Installation, use, or operation of a basic component that contains a deviation as defined above
- or**
- A condition or circumstance that involves a basic component that could contribute to exceeding a safety limit, as defined in the Technical Specifications

**4.11 Deviation (10 CFR 21)**

As used to define Defect, a departure from technical requirements included in a procurement document.

**4.12 Discovery (10 CFR 21)**

Completion of the documentation first identifying the existence of a defect or failure to comply potentially associated with a substantial safety hazard (the date the Shift Manager signs a Condition Report).

**4.13 Discovery Date**

The date an event or situation becomes known. If a Condition Report is dispositioned as not reportable, but subsequently determined to be reportable, the date the Condition Report is redispositioned as reportable.

**4.14 Emergency (State Department of Environmental Quality (Air))**

A sudden, unexpected event that could result in a safety hazard if not immediately attended to, is necessary to prevent equipment damage, or is necessary to avoid imposing unreasonable financial burden.

**4.15 Emergency Response Facilities (ERFs)**

ERFs include:

- Technical Support Center (TSC)
- Local Emergency Operations Center (LEOF)
- Central Emergency Operations Facility (CEOF)
- Control Room (CR)
- Operational Support Center (OSC)

**4.16 Engineered Safety Feature (ESF) [Commitment 3.2.21]**

A function (excluding actuation interlocks) listed in:

- North Anna Technical Specification Table 3.3.2 - 1; UFSAR Chapter 7.3
- Surry Technical Specification Tables 3.7 - 2, 3, & 4; UFSAR Tables 7.5 - 1

**4.17 Engineering Judgment**

A documented engineering analysis or a documented, verifiable statement by a technically qualified individual.

**4.18 Evaluation (10 CFR 21.21)**

The process of determining whether a defect could create a substantial hazard, or determining whether a failure to comply is associated with a substantial safety hazard.

**4.19 Event Date**

The date that an event or situation occurred. If an event date is unknown, the discovery date is used as the event date. For testing that is conducted later than the required time, it should be assumed that the discrepancy occurred at the time the testing was required unless there is firm evidence to indicate that it occurred at a different time.

**4.20 Extremities**

Hands and forearms; feet and ankles.

**4.21 Failure to Comply (10 CFR 21.21)**

Condition of failing to comply with the Atomic Energy Act of 1954, as amended, or any applicable rule, regulation, order, or license of NRC relating to a substantial safety hazard.

**4.22 Fitness for Duty Event, Significant (10 CFR 26)**

- The sale, use, or possession of illegal drugs within the protected area
- An act by a person licensed in accordance with 10 CFR 55 to operate a power reactor, or by supervisory personnel subject to 10 CFR 26, that:
  - Involves the sale, use, or possession of a controlled substance
  - Results in a confirmed positive test
  - Involves use of alcohol within the protected area
  - Results in a determination of unfitness for scheduled work due to the consumption of alcohol

**4.23 Incident (Nuclear Electric Insurance Limited)**

- An event that results in physical damage to property that exceeds, or is expected to exceed, \$100,000
- A fire that involves activation or malfunction of a fixed fire extinguishing or detection system

**4.24 Licensed Material**

Source material, special nuclear material, and by-product material.

**4.25 Navigable Waters (40 CFR 110)**

Waters of the United States, including the territorial seas. The term includes:

- a. All waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the ebb and flow of the tide.
- b. Interstate waters, including interstate wetlands.
- c. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, and wetlands, the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters:
  - (1) That are or could be used by interstate or foreign travelers for recreational or other purposes.
  - (2) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce.
  - (3) That are used or could be used for industrial purposes by industries in interstate commerce.
- d. All impoundments of waters otherwise defined as navigable waters under this section.
- e. Tributaries of waters identified in paragraphs a. through d., including adjacent wetlands.
- f. Wetlands adjacent to waters identified in paragraphs a. through e., provided that waste treatment systems (other than cooling ponds meeting the criteria of this paragraph) are not waters of the United States.

Navigable waters at North Anna begin at the confluence of North Anna River with Pamunkey River, and at Surry begin at the end of the discharge canal concrete liner.

**4.26 Notification (To Notify)**

Conveyance of (to convey) required or pertinent information, often in response to certain events, and typically within a specified time after an event. May be oral (e.g., telephone conversation) or written (e.g., a facsimile, a report, a posted document) unless specifically indicated otherwise (e.g., mandatory use of the telephone).

**4.27 Notification, Immediate**

Communication initiated without administrative or circumstantial delay (subordinate to ensuring the Station is in a safe condition and preserving personnel safety).



**4.28 Report**

A document, often in a required format with specified content. The verb form, “to report,” is synonymous with “to notify.” See also: Notification.

**4.29 Reportable**

Having pre-determined attributes that require notification of someone outside Dominion.

**4.30 Restricted Area**

An area to which access is controlled to protect individuals against undue risks from exposure to radiation and radioactive materials.

**4.31 Sheen (40 CFR 110)**

An iridescent appearance on the surface of water.

**4.32 Sludge (40 CFR 110)**

An aggregate of oil or oil and other matter of any kind in any form other than dredged spoil that has a combined specific gravity equivalent to or greater than water.

**4.33 Source Material**

Uranium or thorium, or any combination thereof, in any physical form; or ores that contain by weight one-twentieth of one percent or more of uranium, thorium, or any combination thereof. Does not include special nuclear material.

**4.34 Special Nuclear Material (SNM)**

- Any material consisting of plutonium, uranium 233, uranium enriched in the isotope 233 or in the isotope 235
- Any other material that NRC, pursuant to the provisions of Section 51 of the Atomic Energy Act of 1954, as amended, determines to be SNM, excluding source material or any material artificially enriched
- Any other material that pursuant to the provisions of Section 51 of the Atomic Energy Act of 1954, as amended, has been determined to be SNM

**4.35 Special Report**

A report, in letter format, required by Technical Specifications or station procedures that describes events or situations judged by Dominion to warrant a written communication (e.g., Subsection 6.29).

**4.36 State Waters**

All water, on the surface and under the ground, wholly or partially within or bordering the Commonwealth of Virginia, or within its jurisdiction.

4.36.1 For purposes of reportability, Dominion does not classify the discharge canal as State Waters. The permanent oil boom in the discharge canal, near the first Waste Heat Treatment Facility lagoon, marks the end of the discharge canal. **(North Anna)**

4.36.2 For purposes of reportability, Dominion does not classify the cooling water discharge canal as State Waters. The permanent oil boom marks the end of the discharge canal. **(Surry)**

**4.37 Substantial Safety Hazard (10 CFR 21—NUREG-0302)**

A loss of safety function to the extent that there is a major reduction in the degree of protection provided to public health and safety for any facility regulated by the NRC under parts 30, 40, 50, 52, 60, 61, 63, 70, 71, or 72.

**4.38 Transport (10 CFR 73)**

Any land, sea, or air conveyance or modules for these conveyances such as rail cars or standardized cargo containers.

**5.0 RESPONSIBILITIES****5.1 Asbestos Removal Contractors**

Asbestos removal contractors are responsible for:

5.1.1 Preparing and, when required, submitting asbestos notification forms to the State Department of Labor and Industry; see Step 6.27.3.b.

5.1.2 Submitting asbestos notification forms to Electric Environmental Services; see Step 6.27.3.b.

**5.2 Director Nuclear Station Safety and Licensing**

The Director Nuclear Station Safety and Licensing is responsible for:

5.2.1 Notifying NRC of significant fitness for duty events (responsibility shared with the Plant Manager (Nuclear)); see Step 6.3.6.b.

- 5.2.2 Notifying the Director NL&OS, the Manager Nuclear Oversight, and the NRC Resident Inspector of events reportable in accordance with 10 CFR 50.72; ensuring that the MSRC receives a copy of associated reports sent to NRC (responsibilities shared with Plant Manager (Nuclear)); see Subsection 6.3.
- 5.2.3 Notifying the Senior Vice President Nuclear Operations and the Nuclear Public Affairs Director or Corporate News Services on weekdays if NPA Director cannot be reached (or Corporate Security on weekends to contact the Public Affairs Duty Officer) of a potentially media significant event (responsibility shared with Site Vice President, Plant Manager (Nuclear), and Shift Manager); see Step 6.27.2.a.
- 5.2.4 Notifying Corporate Risk Management if INPO downgrades the Station to Category 5, suspends Dominion membership, or upgrades the Station to Category 1 (shared with Site Vice President, Plant Manager (Nuclear), and Director NL&OS); see Step 6.28.5.
- 5.2.5 Notifying Corporate Risk Management if the Station operating license is revoked or suspended (shared with Site Vice President, Plant Manager (Nuclear), and Director NL&OS); see Step 6.28.6.a.
- 5.2.6 Approving Emergency Plan activation reports (responsibility shared with Site Vice President and Plant Manager (Nuclear)); see Steps 6.3.5.b.2.. and 6.3.7.b.
- 5.2.7 Approving reports of changes, tests, and experiments; see Steps 6.10.6, and 6.14.3.
- 5.2.8 Reviewing reports for instances of primary coolant activity exceeding limits; see Step 6.24.6. (**Surry**).
- 5.2.9 Reviewing reports of changes in discharge or management of pollutants; see Step 6.27.3.j.
- 5.2.10 Reviewing reports regarding wastewater facility operators; see Step 6.27.3.m.
- 5.2.11 Approving quarterly (NRC/INPO/WANO) data prior to submittal to applicable regulatory agencies.
- 5.2.12 Approving reports of individual monitoring; see Step 6.6.7.
- 5.2.13 Approving radiological effluent release reports; see Step 6.10.3.
- 5.2.14 Approving various reports to the DEQ, as required, as one of the station's Authorized Signatories; see Steps 6.27.3.j. and 6.27.3.m.

- 5.2.15 Approving radiological environmental operating reports; see Steps 6.23.9 and 6.24.8.
- 5.2.16 Approving reports of Technical Specification (TS) bases changes; see Steps 6.23.15 and 6.24.16.

### **5.3 Plant Manager (Nuclear)**

The Plant Manager (Nuclear) is responsible for:

- 5.3.1 Notifying NRC of significant fitness for duty events (responsibility shared with the Director Nuclear Station Safety and Licensing); see Step 6.3.6.b.
- 5.3.2 If the Director Nuclear Station Safety and Licensing is unavailable, notifying the Director NL&OS and the NRC Resident Inspector of events reportable in accordance with 10 CFR 50.72 and ensuring that the MSRC receives a copy of associated reports sent to NRC; see Subsection 6.3.
- 5.3.3 Notifying the Senior Vice President Nuclear Operations and the Nuclear Public Affairs Director or Corporate News Services on weekdays if NPA Director cannot be reached (or Corporate Security on weekends to contact the Public Affairs Duty Officer) of a potentially media significant event (responsibility shared with Site Vice President, Director Nuclear Station Safety and Licensing, and Shift Manager); see Step 6.27.2.a.
- 5.3.4 Notifying Corporate Risk Management if INPO downgrades the Station to Category 5, suspends Dominion membership, or upgrades the Station to Category 1 (shared with Site Vice President, Director Nuclear Station Safety and Licensing, and Senior Vice President Nuclear Operations); see Step 6.28.5.
- 5.3.5 Notifying Corporate Risk Management if the Station operating license is revoked or suspended (shared with Site Vice President, Director Nuclear Station Safety and Licensing, and Senior Vice President Nuclear Operations); see Step 6.28.6.a.
- 5.3.6 Approving Emergency Plan activation reports (responsibility shared with Site Vice President and Director Nuclear Station Safety and Licensing); see Steps 6.3.5.b.2.. and 6.3.7.b.
- 5.3.7 Reviewing reports of changes in discharge or management of pollutants; see Step 6.27.3.j.
- 5.3.8 Reviewing reports regarding wastewater facility operators; see Step 6.27.3.m.

- 5.3.9 Approving various reports to the DEQ, as required, as one of the station's Authorized Signatories; see Steps 6.27.3.j. and 6.27.3.m.

#### **5.4 Auxiliary Boiler Operator**

The auxiliary boiler operator is responsible for notifying Electric Environmental Services of certain boiler operation; see Step 6.27.3.f. **(Surry)**

#### **5.5 Director Corporate Accounting**

The Director Corporate Accounting is responsible for:

- 5.5.1 Forwarding copies of Dominion Annual Reports to the Senior Vice President Nuclear Operations; see Step 6.10.8.a.
- 5.5.2 Preparing reports to guarantee deferred liability insurance policy payment; see Step 6.17.4.a.

#### **5.6 Director Operations Support**

The Director Operations Support is responsible for:

- 5.6.1 Reviewing reports of planned special exposures; see Step 6.6.5.a.
- 5.6.2 Reviewing notifications for first use of low-level waste packages; see Step 6.13.2.b.

#### **5.7 Director Nuclear Protection Services and Emergency Preparedness**

The Director Nuclear Protection Services and Emergency Preparedness is responsible for:

- 5.7.1 Preparing the FERC Regional Engineer notifications of significant changes in upstream or downstream circumstances affecting the North Anna Hydroelectric Project Emergency Action Plan; see Step 6.18.4.a. **(North Anna)**
- 5.7.2 Revising the North Anna Hydroelectric Project Emergency Action Plan to incorporate Independent Consultant Reports; see Step 6.18.4.b. **(North Anna)**
- 5.7.3 Submitting Emergency Plan activation reports; see Steps 6.3.5.b.3. and 6.3.7.c.
- 5.7.4 Submitting Early Warning System Availability reports; see Step 6.27.2.c.
- 5.7.5 Preparing North Anna Hydroelectric Project Emergency Action Plan adequacy review submittal letters; see Step 6.18.4.c. **(North Anna)**

- 5.7.6 Preparing North Anna Hydroelectric Project Emergency Action Plan test exercise summary and critique submittal letters; see Step 6.18.5.b. (**North Anna**)
- 5.7.7 Initiating submittal of emergency plans revised in accordance with 10 CFR 50.54(q); see Step 6.10.5.c.
- 5.7.8 Notifying the Virginia Department of Emergency Management and Virginia Department of Health regarding voluntary reporting for radioactive contamination of groundwater and radioactive spills and/or leaks; see Step 6.31.1.

## **5.8 Environmental Compliance Coordinator**

The Environmental Compliance Coordinator is responsible for:

- 5.8.1 Notifying the State Department of Environmental Quality (Water) and, as appropriate, the National Response Center of oil releases (shared with the Director Electric Environmental Services); see Step 6.3.2.d. (**North Anna**)
- 5.8.2 Notifying appropriate agencies or individuals of hazardous material releases (shared with the Director Electric Environmental Services); see Step 6.3.2.e. (**North Anna**)
- 5.8.3 Notifying the State Department of Environmental Quality (Water) of VPDES permit violations (shared with the Director Electric Environmental Services); see Step 6.3.2.f.
- 5.8.4 Notifying Electric Environmental Services of excess smoke releases (shared with Shift Manager); see Step 6.3.4.b.
- 5.8.5 Notifying Electric Environmental Services when hazardous waste shipment manifests are not returned on time; see Step 6.20.7.b.
- 5.8.6 Notifying the Local Emergency Planning Coordinator and initiating changes to this procedure if the Station has an extremely hazardous substance in an amount greater than its threshold planning quantity; see Step 6.20.9
- 5.8.7 Notifying Electric Environmental Services if an osprey nest is disturbed or a raptor is injured or killed by electrocution; see Step 6.22.4
- 5.8.8 Notifying Electric Environmental Services when manifests for off-site waste shipments that contain asbestos are not returned; see Step 6.27.3.b.

- 5.8.9 Notifying Electric Environmental Services of pollution control equipment malfunctions; see Step 6.27.3.e.
- 5.8.10 Submitting new or revised Material Safety Data Sheets; see Step 6.20.10.a.
- 5.8.11 Preparing and submitting specified reports to the State Department of Environmental Quality (Water); see Step 6.27.3.i.
- 5.8.12 Preparing and submitting Groundwater Pumpage and Use reports; see Step 6.27.3.k. **(Surry)**
- 5.8.13 Preparing and submitting Operation Report Meter Readings reports; see Step 6.27.4.a. **(North Anna)**
- 5.8.14 Preparing and submitting Sewage Treatment Plant Operation reports; see Step 6.27.4.b. **(Surry)**
- 5.8.15 Preparing and submitting Waterworks Operation reports; see Step 6.27.4.c. **(Surry)**
- 5.8.16 Preparing and maintaining a record of oil releases to the ground up to 25 gallons; see Step 6.3.2.d. and its footnote 1.
- 5.8.17 Preparing DOT forms for transportation-related hazardous material events; see Step 6.21.1.a.
- 5.8.18 Preparing notifications of certain events related to the VPDES permit; see Step 6.26.1.b.
- 5.8.19 Preparing environmental operating reports; see Step; 6.26.3.a. **(North Anna)**
- 5.8.20 Preparing and submitting reports of water withdrawals; see Step 6.27.3.r.
- 5.8.21 Preparing and submitting Tier II information forms; see Step 6.20.10.b.
- 5.8.22 Reviewing follow-up reports for unusual or important environmental events; see Step 6.26.2.c. **(North Anna)**
- 5.8.23 Reviewing reports of changes in discharge or management of pollutants; see Step 6.27.3.j.
- 5.8.24 Reviewing reports regarding wastewater facility operators; see Step 6.27.3.m.

- 5.8.25 Notifying Electric Environmental Services of an inadvertent discovery of archeological, historical, or other cultural resource; see Step 6.1.1.b.
- 5.8.26 Notifying Electric Environmental Services of the failure to repair a commercial or comfort refrigeration unit containing greater than 50 pounds of refrigerant within 30 days; see Step 6.20.2.

## **5.9 Fitness for Duty Administrator, Station**

The Fitness for Duty Administrator (Station) is responsible for:

- 5.9.1 Ensuring NRC is notified of significant fitness for duty events or NRC personnel believed to be unfit for duty; see Steps 6.3.2.c. and 6.8.1.
- 5.9.2 Preparing and distributing Attachment 4 for significant fitness for duty events; see Step 6.8.1.
- 5.9.3 Preparing fitness for duty event follow-up reports.

## **5.10 Fitness for Duty Administrator, Corporate**

The Fitness for Duty Administrator (Corporate) is responsible for notifying applicable Station Fitness for Duty Administrators of significant fitness for duty events; see Step 6.8.1.a.

- 5.10.1 Preparing reports of false positive or false negative test results.
- 5.10.2 Preparing reports of unsatisfactory laboratory performance.
- 5.10.3 Preparing fitness for duty event follow-up reports.
- 5.10.4 Preparing annual program reports to NRC; see Step 6.8.4.a.

## **5.11 Fitness for Duty Program Manager**

The Fitness for Duty Program Manager is responsible for:

- 5.11.1 Reviewing and forwarding fitness for duty program false positive test result reports.
- 5.11.2 Approving unsatisfactory performance testing result reports.
- 5.11.3 Reviewing program assessment reports; see Step 6.8.4.b.



**5.12 Lake Anna Dam Operator**

The Lake Anna Dam Operator is responsible for:

- 5.12.1 Notifying the Shift Manager of deaths or serious injuries at or near the dam; see Step 6.3.2.h.
- 5.12.2 Notifying the Shift Manager of conditions that affect the safety of the dam and its associated works; see Step 6.3.2.i.

**5.13 Director Electric Environmental Services**

The Director Electric Environmental Services is responsible for:

- 5.13.1 Notifying the State Department of Environmental Quality (Air) of excess smoke releases; see Step 6.3.4.b.
- 5.13.2 Submitting asbestos notification forms to the State Department of Environmental Quality (Air); see Step 6.27.3.b.
- 5.13.3 Notifying the State Department of Environmental Quality (Air) when manifests for off-site waste shipments that contain asbestos are not returned; see Step 6.27.3.c.
- 5.13.4 Notifying the State Department of Environmental Quality (Air) of pollution control equipment malfunctions; see Step 6.27.3.e.
- 5.13.5 Notifying the State Department of Environmental Quality (Air) regional inspector of auxiliary boiler operation; see Step 6.27.3.f. (**Surry**)
- 5.13.6 Notifying the State Department of Environmental Quality (Water) and, as appropriate, the National Response Center of oil releases (shared with the Environmental Compliance Coordinator); see Step 6.3.2.d. (**North Anna**)
- 5.13.7 Notifying appropriate agencies or individuals of hazardous material releases (shared with the Environmental Compliance Coordinator); see Step 6.3.2.e. (**North Anna**)
- 5.13.8 Notifying the State Department of Environmental Quality (Water) of VPDES permit violations (shared with the Environmental Compliance Coordinator); see Step 6.3.2.f.
- 5.13.9 Notifying the State Department of Environmental Quality (Water) of unplanned bypasses; see Step 6.3.6.f.
- 5.13.10 Notifying the Virginia Department of Environmental Quality regarding voluntary reporting for radioactive contamination of groundwater and radioactive spills and/or leaks; see Step 6.31.1.

- 5.13.11 Notifying Nuclear Licensing and Operations Support of State Department of Environmental Quality (Water) approval of VPDES permit changes; see Step 6.27.3.o. **(Surry)**
- 5.13.12 Coordinating proposed VPDES permit changes with Nuclear Licensing and Operations Support; see Step 6.27.3.m. **(Surry)**
- 5.13.13 Submitting information packages to the EPA Regional Administrator; see Step 6.20.4.
- 5.13.14 Preparing and submitting hazardous waste reports; see Step 6.20.7.a.
- 5.13.15 Preparing and submitting exception reports when hazardous waste shipment manifests are not returned on time; see Step 6.20.7.b.
- 5.13.16 Preparing, approving, and submitting follow-up reports for hazardous material releases; see Step 6.22.3.
- 5.13.17 Preparing and submitting reports of changes in discharge or management of pollutants; see Step 6.27.3.j.
- 5.13.18 Preparing and submitting amendments or revisions to the Oil Discharge Contingency Plan; see Step 6.27.3.l.
- 5.13.19 Preparing and submitting reports regarding wastewater facility operators; see Step 6.27.3.m.
- 5.13.20 Preparing, approving, and submitting follow-up reports for VPDES permit noncompliances; see Step 6.27.3.n.
- 5.13.21 Preparing and submitting reports for tank-bottom-water pump and haul activities; see Step 6.27.3.p. **(Surry)**
- 5.13.22 Preparing and submitting temperature monitoring program reports; see Step 6.27.3.q. **(North Anna)**
- 5.13.23 Reviewing notifications of certain events related to the VPDES permit; see Step 6.26.1.b. **(North Anna)**
- 5.13.24 Preparing follow-up reports for unusual or important environmental events; see Step 6.26.2.b. **(North Anna)**
- 5.13.25 Reviewing environmental operating reports; see Step 6.26.3.a.

- 5.13.26 Notifying the EPA headquarters in accordance with 40 CFR 82.166(N)(i) of the failure to repair a commercial or comfort refrigeration unit containing greater than 50 pounds of refrigerant within 30 days; see Step 6.20.2.

#### **5.14 Director Human Resources Employee Services/Safety & Health**

The Director Human Resources Employee Services/Safety & Health is responsible for:

- 5.14.1 Notifying the FFD Program Manager of false positive test results.
- 5.14.2 Notifying the FFD Program Manager of unsatisfactory laboratory test performance.
- 5.14.3 Reviewing reports of false positive test results and other unsatisfactory laboratory test performance.

#### **5.15 Director Nuclear Analysis and Fuel (NAF)**

The Director NAF is responsible for:

- 5.15.1 Preparing and submitting notifications, and notifying of schedule changes, for spent fuel transport through a state; see Step 6.15.1.
- 5.15.2 Notifying the receiver of impending shipment of SNM of low strategic significance; see Step 6.15.2.a.
- 5.15.3 Notifying the shipper of receipt of SNM of low strategic significance; see Step 6.15.2.b.
- 5.15.4 Preparing, approving, and submitting DOE/NRC material balance reports (Director NLOS may approve as an alternate); see Step 6.16.2.
- 5.15.5 Preparing and submitting DOE/NRC material transaction reports (Director NLOS may approve as an alternate); see Step 6.16.3.
- 5.15.6 Preparing revised assessments for changes in projected values of  $RT_{PTS}$ ; see Step 6.10.7.a.
- 5.15.7 Preparing proposed programs to satisfy 10 CFR 50, App. G; see Step 6.10.14.a.
- 5.15.8 Preparing summary reports of plant startup and power escalation testing; see Step 6.24.4.a. (**Surry**)
- 5.15.9 Preparing a core operating limits report for each refueling; see Steps 6.23.8.a. and 6.24.7.

5.15.10 Coordinating preparation of reports for fracture toughness test specimens; see Step 6.10.15.a.

5.15.11 Reviewing notifications for first use of spent nuclear fuel packages; see Step 6.13.2.c.

## **5.16 Director Corporate Engineering**

The Director Corporate Engineering is responsible for:

5.16.1 Notifying Electric Environmental Services and Licensing (Station) of planned modifications to the dam; see Step 6.18.3.a. **(North Anna)**

5.16.2 Notifying the Shift Manager of emergency corrective measures identified by an independent consultant; see Step 6.18.6.b. **(North Anna)**

5.16.3 Preparing periodic containment leakage test reports; see Step 6.10.17.

5.16.4 Preparing reports of planned modifications to Lake Anna Dam; see Step 6.18.3.b. **(North Anna)**

5.16.5 Obtaining and forwarding independent consultant reports; see Step 6.18.7. **(North Anna)**

5.16.6 Preparing inservice inspection reports; see Steps 6.23.4 and 6.24.5.

## **5.17 Director Nuclear Licensing and Operations Support (NL&OS)**

The Director NL&OS is responsible for:

5.17.1 Notifying appropriate corporate organizations for events reportable in accordance with 10 CFR 50.72; see Step 6.3.1.c.

5.17.2 Notifying NRC of VPDES permit changes; see Steps 6.26.1.b. and 6.27.3.o.

5.17.3 Notifying Corporate Risk Management if INPO downgrades a Station to Category 5, or suspends Dominion membership (shared with Site Vice President and Directors); see Step 6.28.5. |

5.17.4 Notifying Corporate Risk Management of significant NRC actions affecting operating licenses or permission to operate (shared with Site Vice President and Directors); see Step 6.28.6.a. |

- 5.17.5 Notifying the NRC Region II Branch Chief and Project Manager regarding voluntary reporting for radioactive contamination of groundwater and radioactive spills and/or leaks; see Step 6.31.1.
- 5.17.6 Posting notices to workers; see Steps 6.5.1.c. and 6.7.1.a.
- 5.17.7 Reviewing and submitting reports of planned special exposures; see Step 6.6.5.
- 5.17.8 Reviewing and submitting changes to the QA Topical Report; see Step 6.10.5
- 5.17.9 Reviewing and submitting revisions to the Emergency Plan; see Step 6.10.5.c.
- 5.17.10 Reviewing, approving and submitting reports of insurance or financial security; see Step 6.10.5.d.
- 5.17.11 Preparing and submitting reports of program to manage fuel after the reactor operating license expires; see Step 6.10.5.f.
- 5.17.12 Preparing and submitting reports of bankruptcy petitions; see Step 6.10.5.g.
- 5.17.13 Reviewing and submitting revised assessments for changes in projected values of  $RT_{PTS}$ ; see Step 6.10.7.
- 5.17.14 Reviewing and submitting proposed programs to address fracture toughness requirements; see Step 6.10.14.
- 5.17.15 Reviewing and submitting reports for exceeding off-site radiological limits; see Step 6.10.16.
- 5.17.16 Reviewing and submitting notifications for first use of radioactive material packages; see Step 6.13.2.
- 5.17.17 Reviewing and submitting notices for certain events that involve bodily injury or property damage; see Step 6.17.1.
- 5.17.18 Reviewing and submitting notices to indicate material change in, renewal or replacement of liability insurance policies; see Steps 6.17.2 and 6.17.3.
- 5.17.19 Reviewing, approving and submitting reports to guarantee deferred liability insurance policy payment; see Step 6.17.4.
- 5.17.20 Reviewing and submitting DOT Forms F 5800; see Step 6.21.2.

- 5.17.21 Reviewing and submitting reports of planned removal or significant changes to equipment that controls radioactivity in effluents; see Step 6.23.5. **(North Anna)**
- 5.17.22 Reviewing and submitting notifications of certain events related to the VPDES permit; see Step 6.26.1.b. **(North Anna)**
- 5.17.23 Sending NRC documents and correspondence that must be posted at the Station to Licensing (Station); see Step 6.5.1.e.
- 5.17.24 Reviewing reports for exceeding the limits in the Offsite Dose Calculation Manual; see Step 6.10.16.a.
- 5.17.25 Reviewing, approving and submitting fitness for duty program assessment reports; see Step 6.8.4.c.
- 5.17.26 Submitting revisions to the Security Plan per 10 CFR 50.54(p)(1); see Step 6.10.5.b.
- 5.17.27 Submitting revisions to the Emergency Plan per 10 CFR 50.54(q) or 10 CFR 72.44(f); see Step 6.10.5.c.
- 5.17.28 Submitting Dominion Annual Reports; see Step 6.10.8.b.
- 5.17.29 Submitting 10 CFR 50, Appendix H reports; see Step 6.10.15.b.
- 5.17.30 Submitting notices of material changes in proof of financial protection or other financial information to comply with 10 CFR 140; see Step 6.17.2.b.
- 5.17.31 Submitting startup reports; see Step 6.24.4.d.
- 5.17.32 Submitting follow-up reports for notifications of license violations; see Step 6.23.6.b. **(North Anna, Unit 2)**
- 5.17.33 Approving and submitting core operating limits reports; (Director NSS&L may approve as an alternate) see Steps 6.23.8.d. and 6.24.7.
- 5.17.34 Submitting copies of VPDES permit violation reports; see Steps 6.26.1.a. and 6.27.3.n.
- 5.17.35 Submitting copies of proposed VPDES permit changes; see Steps 6.26.1.b. and 6.27.3.o.
- 5.17.36 Preparing, obtaining Senior Financial Officer responsible for Decommissioning Trust Fund concurrence and submitting decommissioning reports; see Step 6.10.13.

- 5.17.37 Preparing and submitting to Corporate Treasury, Site Specific Cost Studies for decommissioning; see Steps 6.10.13 and 6.27.1.c.
- 5.17.38 Ensuring annual updates to the Decommissioning Trust Fund Status are submitted by Corporate Treasury; see Step 6.27.1.
- 5.17.39 Approving and submitting ECCS Evaluation Model changes report; see Step 6.10.4.

## **5.18 Director Nuclear Oversight**

The Director Nuclear Oversight is responsible for reviewing submittals of changes to the QA Topical Report; see Step 6.10.5.a.

## **5.19 Director Nuclear Training**

The Director Nuclear Training is responsible for:

- 5.19.1 Reviewing notifications of change in operator or senior operator status; see Step 6.10.12.b.
- 5.19.2 Preparing and reviewing reports of simulator status; see Step 6.11.2.

## **5.20 Director Corporate Risk Management**

The Director Corporate Risk Management is responsible for:

- 5.20.1 Notifying insurers of certain changes in INPO rating and membership; see Step 6.28.5.
- 5.20.2 Notifying insurers of operating license suspension or revocation; see Step 6.28.6.b.
- 5.20.3 Preparing insurance or financial security reports; see Step 6.10.5.d.
- 5.20.4 Preparing notices for certain events that involve bodily injury or property damage; see Step 6.17.1.a.
- 5.20.5 Preparing notices of material changes in proof of financial protection or other financial information to comply with 10 CFR 140; see Step 6.17.2.a.
- 5.20.6 Preparing notices to indicate renewal or replacement liability insurance policies; see Step 6.17.3.a.

## **5.21 EPIX (Equipment Performance Information Exchange) Coordinator**

The EPIX Coordinator is responsible for determining whether component failures or malfunctions are reportable to EPIX; see Step 6.10.11.e. [**Commitment 3.2.3**]

**5.22 Senior Vice President Nuclear**

The Senior Vice President Nuclear is responsible for:

- 5.22.1 Reissuing Shift Supervisor Responsibility Directives; see Step 6.29.7.
- 5.22.2 Submitting reports of fitness for duty program false positive test results.
- 5.22.3 Submitting reports of unsatisfactory performance testing results.
- 5.22.4 Submitting letters that describe chemical test program changes.
- 5.22.5 Approving notifications for proposed programs to address fracture toughness requirements; see Step 6.10.14.c.
- 5.22.6 Approving notifications for first use of NRC pre-approved radioactive material packages; see Step 6.13.2.d.
- 5.22.7 Approving notifications of spent fuel transport through a state; see Step 6.15.1.c.

**5.23 Shift Manager**

The Shift Manager is responsible for:

- 5.23.1 Notifying the NRC Operations Center of specified events; see Steps 6.3.1.b., 6.3.4.a., and 6.3.6.a.
- 5.23.2 Notifying Dominion personnel of events reportable in accordance with 10 CFR 50.72; see Step 6.3.1.c.
- 5.23.3 Notifying Dominion personnel of potential oil discharge events; see Step 6.3.2.d.
- 5.23.4 Notifying the State Department of Environmental Quality (Water) and, as appropriate, the National Response Center and the U.S. Coast Guard, of oil releases; see Step 6.3.2.d. **(Surry)**
- 5.23.5 Notifying appropriate agencies or individuals of hazardous material releases; see Step 6.3.2.e. **(Surry)**
- 5.23.6 Notifying appropriate agencies of transportation-related hazardous material releases; see Step 6.3.2.g.
- 5.23.7 Notifying FERC and initiating deviation reports for deaths or serious injuries at or near the dam; see Step 6.3.2.h. **(North Anna)**



- 5.23.8 Notifying FERC of conditions that affect the safety of the dam and its associated works; see Step 6.3.2.i. **(North Anna)**
- 5.23.9 Notifying the NRC Operations Center of specified events (responsibility shared with Site Vice President); see Step 6.3.3.
- 5.23.10 Notifying the Environmental Compliance Coordinator of smoke releases and notifying Electric Environmental Services of excess smoke releases (shared with Environmental Compliance Coordinator); see Step 6.3.4.b.
- 5.23.11 Notifying NRC of unusual or important events with potentially significant environmental impact; see Step 6.3.6.c. **(North Anna)**
- 5.23.12 Notifying the Supervisor Licensing (Station) of planned removal, and subsequent restoration of warning and safety devices from service at the main dam; see Step 6.18.8.a. **(North Anna)**
- 5.23.13 Notifying the Supervisor Licensing (Station) that voluntary communications are required for radioactive contamination of groundwater and radioactive spills and/or leaks; see Step 6.31.1.
- 5.23.14 Notifying Station management of any event that may be of media significance; see Step 6.27.2.a.
- 5.23.15 Notifying the Senior Vice President Nuclear Operations and the Nuclear Public Affairs Director or Corporate News Services on weekdays if NPA Director cannot be reached (or Corporate Security on weekends to contact the Public Affairs Duty Officer) of a potentially media significant event (responsibility shared with Site Vice President, Plant Manager (Nuclear), Director, and Manager Nuclear Operations); see Step 6.27.2.a.

#### **5.24 Shift Technical Advisor (STA)**

The STA is responsible for notifying Station management of events reportable in accordance with 10 CFR 50.72; see Step 6.3.1.c.

#### **5.25 Station Coordinator Emergency Preparedness**

The Station Coordinator Emergency Preparedness is responsible for:

- 5.25.1 Preparing, and after approval, forwarding emergency plan activation reports; see Steps 6.3.5.b.1. and 6.3.7.a.

5.25.2 Ensuring that copies of the current North Anna Hydroelectric Project Emergency Action Plan are posted; see Step 6.18.5.a. **(North Anna)**

5.25.3 Entering data into INPO's Consolidated Data Entry (CDE) System; see Subsection 6.30.

## **5.26 Site Vice President**

The Site Vice President is responsible for:

5.26.1 Notifying the NRC Operations Center of specified events (responsibility shared with Shift Manager); see Step 6.3.3.

5.26.2 Designating an Director to notify NRC of significant fitness for duty events; see Step 6.3.6.b.

5.26.3 Notifying the Senior Vice President Nuclear Operations and the Nuclear Public Affairs Director or Corporate News Services on weekdays if NPA Director cannot be reached (or Corporate Security on weekends to contact the Public Affairs Duty Officer) of a potentially media significant event (responsibility shared with Directors, Manager Nuclear Operations, and Shift Manager); see Step 6.27.2.a.

5.26.4 Notifying Corporate Risk Management if INPO downgrades the Station to Category 5, suspends Dominion membership, or upgrades the Station to Category 1 (shared with Site Vice President, Director Nuclear Station Safety and Licensing, and Director NL&OS); see Step 6.28.5.

5.26.5 Notifying Corporate Risk Management if the Station operating license is revoked or suspended (shared with Site Vice President, Director Nuclear Station Safety and Licensing, and Director NL&OS); see Step 6.28.6.a.

5.26.6 Notifying the County Administrator regarding voluntary reporting for radioactive contamination of groundwater and radioactive spills and/or leaks; see Step 6.31.1.

5.26.7 Approving and submitting reports for exceeding untreated liquid or gaseous waste discharge limits; see Step 6.10.16.b.

5.26.8 Approving Emergency Plan activation reports (responsibility shared with Directors); see Steps 6.3.5 and 6.3.7.b.

5.26.9 Approving Licensee Event Reports (LERs); see Step 6.10.11.c.

- 5.26.10 Approving follow-up reports for unusual or important environmental events; see Step 6.26.2.d. **(North Anna)**
- 5.26.11 Approving additional information reports for adverse conditions; see Step 6.28.2.e.
- 5.26.12 Approving discretionary special reports; see Subsection 6.29.
- 5.26.13 Reviewing certain reports prepared in accordance with 10 CFR 50.54; see Step 6.10.5.
- 5.26.14 Reviewing notifications of change in operator or senior operator status; see Steps 6.10.12.c. and 6.10.12.d.
- 5.26.15 Reviewing and approving immediate notification follow-up reports for conditions that affect the safety of Lake Anna Dam; see Step 6.18.1.d. **(North Anna)**
- 5.26.16 Reviewing and approving reports of planned modifications to Lake Anna Dam; see Step 6.18.3.c. **(North Anna)**
- 5.26.17 Reviewing and approving notification letters for removal and restoration of Lake Anna Dam safety devices; see Step 6.18.8.c. **(North Anna)**
- 5.26.18 Approving reports of deaths or serious injuries at or near the Lake Anna Dam; see Step 6.18.2.d. **(North Anna)**
- 5.26.19 Approving notifications of significant changes in upstream or downstream circumstances affecting the North Anna Hydroelectric Project Emergency Action Plan; see Step 6.18.4.a. **(North Anna)**
- 5.26.20 Approving submittals of North Anna Hydroelectric Project Emergency Action Plan adequacy reviews and North Anna Hydroelectric Project Emergency Action Plan revisions; see Step 6.18.4.c. **(North Anna)**
- 5.26.21 Approving submittals of North Anna Hydroelectric Project Emergency Action Plan test exercise summaries and critiques; see Step 6.18.5.c. **(North Anna)**
- 5.26.22 Reviewing follow-up reports for hazardous material releases; see Step 6.22.3.b.
- 5.26.23 Reviewing, approving and submitting environmental operating reports; see Step 6.26.3. **(North Anna)**

- 5.26.24 Approving and submitting notifications of change in operator or senior operator status; see Steps 6.10.12.e. and 6.10.12.f.
- 5.26.25 Submitting special reports related to Reactor Vessel Overpressure Mitigating System actuations; see Step 6.24.13.a. **(Surry)**
- 5.26.26 Submitting special reports related to inoperable explosive gas monitoring instrumentation; see Step 6.24.13.b. **(Surry)**
- 5.26.27 Submitting reports related to inoperable accident monitoring instrumentation; see Step 6.24.17 **(Surry)**
- 5.26.28 Submitting special reports related to waste gas holdup system oxygen concentration; see Step 6.24.13.c. **(Surry)**
- 5.26.29 Submitting special reports related to quadrant to average power tilt; see Step 6.24.13.d. **(Surry)**
- 5.26.30 Submitting copies to NRC (if NRC is not notified of an event) of reports provided to other agencies regarding unusual or important environmental events; see Step 6.26.2.e.
- 5.26.31 Approving steam generator tube reports (Vice President Nuclear Engineering may approve as an alternate); see Steps 6.23.7 and 6.24.14.
- 5.26.32 Approving reports for the Reactor Pressure Vessel Head inspection results; see Steps 6.23.14 and 6.24.14.
- 5.26.33 Approving inservice inspection reports (Director NSS&L or Director NLOS may approve as alternates); see Steps 6.23.4 and 6.24.5.

## **5.27 Facility Safety Review Committee (FSRC)**

FSRC is responsible for:

- 5.27.1 Arbitrating disagreements on issues of reportability, as specified in PI-AA-200.
- 5.27.2 Approving Substantial Safety Hazard Evaluations, determining whether defects or failures to comply are potentially reportable, and notifying others as appropriate; see Step 6.7.2.

- 5.27.3 Approving revised assessments for changes in projected values of  $RT_{PTS}$ ; see Step 6.10.7.c.
- 5.27.4 Approving startup reports; see Step 6.24.4.c. **(Surry)**
- 5.27.5 Approving special reports to NRC; see Steps 6.23.1 and 6.24.1.
- 5.27.6 Approving core operating limits reports; see Steps 6.23.8.b. and 6.24.7.
- 5.27.7 Reviewing certain reports submitted in accordance with 10 CFR 50.54; see Step 6.10.5.
- 5.27.8 Reviewing proposed programs to address fracture toughness requirements; see Step 6.10.14.b.
- 5.27.9 Reviewing reports for exceeding untreated liquid or gaseous waste discharge limits; see Step 6.10.16.b.
- 5.27.10 Reviewing periodic containment leakage test reports; see Step 6.10.17.d.
- 5.27.11 Reviewing and approving events reportable in accordance with 10 CFR 50.73; see Step 6.10.11.c. Submitting results to the Senior Vice President Nuclear Operations and MSRC; see Step 6.24.2. **(Surry)**
- 5.27.12 Reviewing Safety Limit Violation Reports; see Step 6.24.3 **(Surry)**
- 5.27.13 Reviewing special reports for Reactor Vessel Overpressure Mitigating System use to mitigate RCS pressure transients; see Step 6.24.13.a. **(Surry)**
- 5.27.14 Reviewing special reports related to inoperable explosive gas monitoring instrumentation; see Step 6.24.13.b. **(Surry)**
- 5.27.15 Reviewing reports related to inoperable accident monitoring instrumentation; see Step 6.24.17 **(Surry)**
- 5.27.16 Reviewing special reports related to waste gas holdup system oxygen concentration; see Step 6.24.13.c. **(Surry)**
- 5.27.17 Reviewing special reports related to quadrant to average power tilt; see Step 6.24.13.d. **(Surry)**
- 5.27.18 Reviewing discretionary reports to NRC; see Subsection 6.29.

**5.28 Manager Nuclear Training**

The Manager Nuclear Training is responsible for preparing notifications of changes in operator or senior operator license status; see Step 6.10.12.a.

**5.29 Manager Nuclear Operations**

The Manager Nuclear Operations is responsible for:

- 5.29.1 Notifying Station management of events reportable in accordance with 10 CFR 50.72; see Step 6.3.1.c.
- 5.29.2 Notifying Station management of potentially media significant events; see Step 6.27.2.a.
- 5.29.3 Notifying the Senior Vice President Nuclear Operations and the Nuclear Public Affairs Director or Corporate News Services on weekdays if NPA Director cannot be reached (or Corporate Security on weekends to contact the Public Affairs Duty Officer) of a potentially media significant event (responsibility shared with Site Vice President, Directors, and Shift Manager); see Step 6.27.2.a.
- 5.29.4 Preparing notifications of changes in operator or senior operator license status; see Step 6.10.12.b.
- 5.29.5 Reviewing reports of deaths or serious injuries at or near the dam; see Step 6.18.2.c. **(North Anna)**
- 5.29.6 Entering data into INPO's Consolidated Data Entry (CDE) System; see Subsection 6.30.

**5.30 Manager Radiological Protection**

The Manager Radiological Protection is responsible for:

- 5.30.1 Notifying Director Operations Support of excess package contamination or radiation; see Step 6.3.2.b.
- 5.30.2 Notifying NRC and the final carrier of package excess surface contamination or excess radiation (shared with Supervisor Licensing (Station)) and initiating a Condition Report; see Step 6.3.2.b.
- 5.30.3 Preparing reports of planned special exposures; see Step 6.6.5.a.
- 5.30.4 Preparing reports of individual monitoring; see Step 6.6.7.a.

- 5.30.5 Preparing, approving, and submitting the annual reconciliation report to the National Source Tracking System; see Step 6.6.8.
- 5.30.6 Preparing radiological effluent release reports; see Steps 6.10.3.a. and 6.10.16.a.
- 5.30.7 Preparing notifications for first use of radioactive material packages; see Step 6.13.2.a.
- 5.30.8 Preparing reports of significant reductions in low-level waste packaging effectiveness or defects in low-level waste packaging; see Step 6.13.3.c.
- 5.30.9 Preparing reports of significant reductions in spent fuel packaging effectiveness or defects in spent fuel packaging; see Step 6.13.3.f.
- 5.30.10 Preparing radiological environmental operating reports; see Step 6.23.9.a.
- 5.30.11 Preparing special reports for mishaps involving low level waste forms; see Step 6.29.5.
- 5.30.12 Entering data into INPO's Consolidated Data Entry (CDE) System; see Subsection 6.30.

### **5.31 Manager Nuclear Security**

The Manager Nuclear Security is responsible for:

- 5.31.1 Providing clarification and guidance to Shift Managers for reportability determinations, as specified in PI-AA-200.
- 5.31.2 Providing clarification and guidance, as requested, to support Licensing (Station) preparation of safeguards LERs; see Step 6.10.11.d.
- 5.31.3 Preparing reports of changes to the Station physical security plan, training and qualification plan, or safeguards contingency plan; see Step 6.14.12.a.
- 5.31.4 Entering data into INPO's Consolidated Data Entry (CDE) System; see Subsection 6.30.

### **5.32 Manager Site Engineering**

The Manager Site Engineering is responsible for:

- 5.32.1 Supporting preparation of LERs; see Step 6.10.11.d.
- 5.32.2 Assisting with preparation of reports for discretionary reporting items; see Subsection 6.29.

5.32.3 Entering data into INPO's Consolidated Data Entry (CDE) System; see Subsection 6.30.

### **5.33 Supervisor, Fuel Performance Analysis**

The Supervisor, Fuel Performance Analysis is responsible for:

5.33.1 Approving nuclear material transaction reports; see Step 6.16.3.

5.33.2 Entering data into INPO's Consolidated Data Entry (CDE) System; see Subsection 6.30.

### **5.34 Supervisor ISI/IST/Materials Engineering (Station)**

The Supervisor ISI/IST/Materials Engineering (Station) is responsible for:

5.34.1 Preparing steam generator tube reports; see Steps 6.23.7 and 6.24.14.

5.34.2 Preparing results of Reactor Pressure Vessel Head related nonvisual nondestructive (NDE) examinations; see Steps 6.23.14 and 6.24.15.

### **5.35 Supervisor ISI/DBD/UFSAR Engineering**

The Supervisor ISI/DBD/UFSAR Engineering is responsible for:

5.35.1 Preparing inservice inspection reports; see Steps 6.23.4 and 6.24.5.

5.35.2 Preparing UFSAR updates for submittal to the NRC; see Step 6.10.9.

5.35.3 Preparing ISFSI FSAR updates for submittal to the NRC; see Step 6.14.5.

### **5.36 Supervisor Licensing (Station)**

The Supervisor Licensing (Station) is responsible for:

5.36.1 Notifying the NRC Regional Office of failures related to safeguards and security, or failures to notify NRC of planned removal or significant change in radioactive effluent control equipment; see Step 6.3.6.d. (**North Anna**)

5.36.2 Submitting discretionary special reports; see Subsection 6.29.

5.36.3 Confirming fire suppression nonfunctionality notifications; see Step 6.3.6.a.

5.36.4 Posting notices to Station workers; see Steps 6.5.1 and 6.7.1.a.

5.36.5 Preparing and submitting reports of changes, tests, and experiments; see Step 6.10.6. [**Commitment 3.2.1**] and see Step 6.14.3.



- 5.36.6 Preparing, obtaining approvals, and submitting LERs; see Step 6.10.11.c.
- 5.36.7 Preparing and submitting immediate notification follow-up reports for conditions that affect the safety of Lake Anna Dam; see Step 6.18.1.b. **(North Anna)**
- 5.36.8 Preparing and submitting FERC Database reports for deaths or serious injuries at or near the dam; see Step 6.18.2.b. **(North Anna)**
- 5.36.9 Notifying the FERC Regional Engineer of significant changes in upstream or downstream circumstances affecting the North Anna Hydroelectric Project Emergency Action Plan; see Step 6.18.4.a. **(North Anna)**
- 5.36.10 Preparing and submitting notification letters for removal and restoration of Lake Anna Dam safety devices; see Step 6.18.8 **(North Anna)**.
- 5.36.11 Preparing follow-up reports for license violations; see Step 6.23.6.b. **(North Anna)**
- 5.36.12 Preparing reports for instances of primary coolant activity exceeding limits; see Step 6.24.6. **(Surry)**.
- 5.36.13 Preparing special reports for Reactor Vessel Overpressure Mitigating System use to mitigate RCS pressure transients; see Step 6.24.13.a. **(Surry)**
- 5.36.14 Preparing special reports related to inoperable explosive gas monitoring instrumentation; see Step 6.24.13.b. **(Surry)**
- 5.36.15 Preparing reports related to inoperable accident monitoring instrumentation; see Step 6.24.17 **(Surry)**
- 5.36.16 Preparing special reports related to waste gas holdup system oxygen concentration; see Step 6.24.13.c. **(Surry)**
- 5.36.17 Preparing special reports related to quadrant to average power tilt; see Step 6.24.13.d. **(Surry)**
- 5.36.18 Obtaining from the EPIX Coordinator a determination of EPIX reportability (to include in LERs) of equipment failures or malfunctions; see Step 6.10.11.e.
- 5.36.19 Notifying NRC and the final carrier of package excess surface contamination or excess radiation levels (shared with Manager Radiological Protection) and initiating a Condition Report; see Step 6.3.2.b.
- 5.36.20 Notifying the Department of Transportation of transport incidents that involve radioactive material; see Step 6.3.2.g.

- 5.36.21 Reviewing quarterly (NRC/INPO/WANO) data prior to submittal to applicable regulatory agencies; see Subsection 6.30.
- 5.36.22 Notifying the NRC Senior Resident Inspector and designated Dominion personnel regarding voluntary reporting for radioactive contamination of groundwater and radioactive spills and/or leaks; see Step 6.31.1.
- 5.36.23 Submitting steam generator tube reports to the NRC; see Steps 6.23.7 and 6.24.14.
- 5.36.24 Submitting reports to the NRC for Reactor Pressure Vessel Head inspection results; see Steps 6.23.14 and 6.24.14.
- 5.36.25 Reviewing and submitting reports of individual monitoring; see Step 6.6.7.
- 5.36.26 Reviewing and submitting radiological effluent release reports; see Step 6.10.3.
- 5.36.27 Submitting inservice inspection reports (Corporate Licensing may submit as an alternate); see Steps 6.23.4 and 6.24.5.
- 5.36.28 Reviewing and submitting radiological environmental operating reports; see Steps 6.23.9 and 6.24.8.
- 5.36.29 Preparing and submitting reports of Technical Specification (TS) bases changes; see Step 6.23.15.
- 5.36.30 Reviewing and submitting reports for instances of primary coolant activity exceeding limits; see Step 6.24.6 (**Surry**)
- 5.36.31 Preparing, obtaining approvals, and submitting reports to the NRC related to general license ISFSI; see Step 6.14.13.

### **5.37 Supervisor Maintenance Support**

The Supervisor Maintenance Support is responsible for:

- 5.37.1 Notifying the Supervisor Nuclear Site Safety (Station) of certain potential adverse conditions; see Step 6.28.2.a.
- 5.37.2 Notifying the Supervisor Nuclear Site Safety (Station) of significant additional information related to certain potential adverse conditions and preparing reports to document such information; see Step 6.28.2.c.
- 5.37.3 Notifying the Supervisor Nuclear Site Safety (Station) of, and preparing reports to document, certain potential incidents; see Step 6.28.3.a.

**5.38 Supervisor Nuclear Site Safety**

The Supervisor Nuclear Site Safety is responsible for:

- 5.38.1 Preparing and ensuring submittal of initial and follow-up notification letters to nuclear insurers for inspection report compliance recommendations; see Step 6.28.1.
- 5.38.2 Determining reportability of potential adverse conditions and notifying the insurer of adverse conditions; see Step 6.28.2.
- 5.38.3 Reviewing and submitting additional information reports for adverse conditions; see Step 6.28.2.
- 5.38.4 Determining reportability of potential incidents and notifying the insurer of incidents; see Step 6.28.3.
- 5.38.5 Notifying the OSHA of accidental deaths or multiple injuries; see Step 6.3.5.c.3.
- 5.38.6 Notifying the NEIL of fire system impairments and corrections; see Step 6.28.4.a.
- 5.38.7 Posting OSHA form No. 300 - Log of Work-Related Injuries and Illnesses; see Step 6.19.1.a.

**5.39 Supervisor Station Nuclear Safety**

The Supervisor Station Nuclear Safety is responsible for ensuring that appropriate assignments are made through the Corrective Action Program to ensure compliance with 10 CF 21; see Step 6.7.2

**5.40 Senior Vice President Nuclear Operations**

The Senior Vice President Nuclear Operations is responsible for:

- 5.40.1 Approving reports of planned special exposures; see Step 6.6.5.c.
- 5.40.2 Approving reports of changes to the Station physical security plan, training and qualification plan, or safeguards contingency plan; see Step 6.14.12.c.
- 5.40.3 Approving notices for certain events that involve bodily injury or property damage; see Step 6.17.1.c.
- 5.40.4 Approving notices to indicate renewal or replacement liability insurance policies; see Step 6.17.3.c.
- 5.40.5 Approving DOT Forms F 5800; see Step 6.21.1.c.

- 5.40.6 Approving follow-up reports for license violations; see Step 6.23.6.b.
- 5.40.7 Approving notifications of certain events related to the VPDES permit; see Step 6.26.1.b. (**North Anna**)
- 5.40.8 Notifying the State Corporation Commission Staff of unplanned outages; see Step 6.27.1.a.
- 5.40.9 Reporting outage information to the State Corporation Commission; see Step 6.27.1.b.

#### **5.41 Boric Acid Corrosion Control (BACC) Coordinator**

The Boric Acid Corrosion Control (BACC) Coordinator is responsible for preparing results of Reactor Pressure Vessel Head related visual inspections; see Steps 6.23.14 and 6.24.15.

#### **5.42 Supervisor Nuclear Spent Fuel (Nuclear Analysis and Fuel)**

The Supervisor Nuclear Spent Fuel is responsible for notifying the Supervisor Licensing (Station) of the date planned for first storage of spent fuel under an ISFSI general license, and after using a cask to store spent fuel; see Step 6.14.13.

## 6.0 INSTRUCTIONS

### 6.1 General

This Section presents required notifications and reports on the basis of initiating mechanisms. Non-scheduled initiating mechanisms are those that cannot be, or are not easily, pre-scheduled. Non-scheduled mechanisms are further classified according to event or condition, or according to time limitations for fulfilling the required action, or both. Scheduled reports are those whose completion can be pre-scheduled. Subsections 6.2, Non-Scheduled Notifications and Reports, and 6.4, Scheduled Reports, summarize requirements and implementation processes for both groups. Subsections 6.5 through 6.29 provide the details for each requirement.

**NOTE:** PI-AA-200, Corrective Action, establishes responsibilities and *processing* requirements for initiating and obtaining determinations of reportability for most non-periodic events. [**Commitment 3.2.2**]

#### 6.1.1 Notifications

- a. Voice or fax notifications or confirmations by dialable telephone, to individuals or organizations outside Dominion, shall be to the numbers listed in the:
  - Applicable Emergency Plan Implementing Procedure
  - Emergency Telephone Directory

Voice notification numbers that may not be included in the above listed documents are:

- NRC Director, Spent Fuel Project Office—(301) 415-8500
- National Response Center (EPA and U.S. Coast Guard)—(800) 424-8802
- U.S. Coast Guard—(804) 441-3314 (**Surry**)
- FERC Regional Engineer—(678) 245-3069
- Department of Transportation (DOT)—(800) 424-8802 or (202) 426-2675
- Office of Pesticides & Toxic Substances—(215) 597-8598

**6.1.1 Notifications (continued)**

- State Department of Environmental Quality—  
Air/Water/Waste Regional Office—  
(703) 583-3800 or (after hours) DEM (800) 468-8892 (**North Anna**)  
Air/Water/Waste Regional Office—  
(804) 527-5020 or (after hours) DEM (800) 468-8892 (**Surry**)  
Groundwater Notification—  
(703) 583-3810 or (703) 583-3813 (**North Anna**)  
Groundwater Notification—  
(804) 698-5053 or (804) 527-5038 (**Surry**)
- State Corporation Commission—(804) 371-9611
- Area Director of Occupational Safety and Health Administration (OSHA)—  
(804) 371-2327
- Nuclear Electric Insurance Limited (NEIL) — (877) 634-5911
- American Nuclear Insurers (ANI)—(860) 682-1301
- Local County Administrator—
  - Louisa County—(540) 967-0401
  - Surry County—(757) 294-5271
- State Department of Emergency Management—(804) 674-2400, ask for EOC Duty Officer

**Fax numbers** that may not be included in the above listed documents are:

- NRC Operations Center—(301) 816-5151
- NRC Regional Office—(404) 997-4900
- State Department of Environmental Quality —
  - Air/Water/Waste/Pollution Response Regional Office-  
(804) 527-5106 (**Surry**)
  - Air/Water/Waste/Pollution Response Regional Office-  
(703) 583-3871 (**North Anna**)
- Nuclear Electric Insurance Limited—  
(302) 888-3008
- American Nuclear Insurers—(860) 659-0002

- b. Notifications to other departments inside Dominion for consideration of additional action(s) to be taken include Electric Environmental Services.

**6.1.2 Reports**

- a. Individuals or organizations responsible for preparing a report shall collect, interpret, and ensure the accuracy and validity of information required for a report in accordance with this procedure and with applicable implementing procedures.
- b. Individuals or organizations responsible for reviewing a report shall conduct a technical, administrative, and regulatory review, as appropriate.
- c. Documents to be submitted to NRC shall be sent to:
  - U.S. Nuclear Regulatory Commission
  - ATTN: Document Control Desk
  - Washington, DC 20555-0001
- d. Documents to be submitted to the NRC Regional Office shall be sent to:
  - USNRC
  - Region II
  - Marquis One Tower
  - 245 Peachtree Center Avenue, NE, Suite 1200
  - Atlanta, GA 30303-1257
- e. Documents to be submitted to the REIRS Project Manager shall be sent to:
  - REIRS Project Manager
  - Office of Nuclear Regulatory Research
  - U.S. Nuclear Regulatory Commission
  - Washington, DC 20555-0001
- f. Documents to be submitted to the Office of Nuclear Material Safety and Safeguards shall be sent to:
  - Director, Office of Nuclear Material Safety and Safeguards
  - U.S. Nuclear Regulatory Commission
  - Washington, DC 20555-0001
- g. Documents to be submitted to the Division of Low-Level Waste Management and Decommissioning shall be sent to:
  - Director, Division of Low-Level Waste Management and Decommissioning
  - U.S. Nuclear Regulatory Commission
  - Washington, DC 20555-0001
- h. Documents to be submitted to the FERC Regional Office shall be sent to:
  - Federal Energy Regulatory Commission
  - Atlanta Regional Office
  - 3700 Crestwood Parkway, NW, Suite 950
  - Duluth, GA 30096

- i. Documents to be submitted to the Virginia Department of Emergency Management shall be sent to:

Virginia Department of Emergency Management  
10501 Trade Court  
Richmond, VA 23236-3713

- j. Documents to be submitted to the State Department of Environmental Quality shall be sent to:

**Air**

Gregory L. Clayton, Director  
State Department of Environmental Quality (Air)  
300 Central Road, Suite B  
Fredericksburg, VA 22401 (**North Anna**)

Robert L. Beasley, Director  
State Department of Environmental Quality (Air)  
Arboretum 5, Suite 250  
9210 Arboretum Parkway  
Richmond, VA 23236 (**Surry**)

**Water**

Northern Virginia Regional Office (NVRO)  
13901 Crown Court  
Woodbridge, VA 22193 (**North Anna**)

Water Regional Office  
P.O. Box 11143  
Richmond, VA 23230-1143 (**Surry**)

- k. Documents to be submitted to the Virginia Department of Health shall be sent to:

Office of Water Programs  
Environmental Engineering Field Office  
131 Walker Street  
Lexington, VA 24450-2431 (**North Anna**)

Virginia Department of Health  
Southeast Virginia Regional Office  
5700 Thurston, Suite 203  
Virginia Beach, VA 23455 (**Surry**)



- l. Documents to be submitted to American Nuclear Insurers shall be sent to:

American Nuclear Insurers  
95 Glastonbury Boulevard, Suite 300  
Glastonbury, CT 06033

- m. Documents to be submitted to Nuclear Electric Insurance Limited shall be sent to:

David Scott or Greg Wilks  
Nuclear Electric Insurance Limited  
Manufacturers Hanover Plaza  
1201 Market Street, Suite 1200  
Wilmington, DE 19801

- n. Documents to be submitted to the South Carolina Department of Health and Environmental Control shall be sent to:

South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29209

- o. Documents submitted to the local County Administrator shall be sent to:

Louisa County Administrator  
P.O. Box 160  
Louisa, VA 23093

Surry County Administrator  
P. O. Box 65  
Surry, VA 23883

## 6.2 Non-Scheduled Notifications and Reports

**NOTE:** Reportability determinations for items included in Step 6.2.1 are initiated and processed in accordance with PI-AA-200, Corrective Action.

### 6.2.1 Critical, Significant, and Potentially Significant Events or Conditions

**NOTE:** Notifications required by activation of the Emergency Action Plan for Lake Anna Dam are established and controlled by the Plan. However, see Step 6.3.4.a.4.

a. **Emergency Plan Activation**—See Steps **6.3.2**, **6.3.5**, and **6.3.7**.

**NOTE:** Operability/functionality (availability) is established by the controlling procedure (e.g., Technical Specifications, Station Administrative Procedure). Requirements in this procedure to report inoperable/nonfunctional systems or equipment generally rely on other procedures to establish the basis for determining operability/functionality.

#### b. Systems and Components

- Reactor trip—See Steps **6.3.3**, 6.3.4.a., 6.10.11, 6.27.1.a., and 6.27.2
- Inoperable/nonfunctional (including unavailable or out of service) systems or components—See Steps **6.3.3**, 6.7.2, 6.10.2, 6.10.11, 6.24.13.b., 6.24.17, 6.28.2, 6.28.3, 6.29.1, 6.29.2, 6.29.3, 6.29.4 and 6.29.6
- Fire detection, suppression, or barrier inoperability/nonfunctionality—See Steps **6.3.5.d.**, **6.3.6.a.**, 6.25.1 and 6.28.4
- Defective systems or components—See Steps **6.3.4.1.**, 6.7.2, 6.10.2, 6.10.11 and 6.27.3.e.
- Unacceptable containment leak rate test results—See Step 6.10.17
- Significant changes in projected values of  $RT_{PTS}$ —See Step 6.10.7
- Reactor Vessel Overpressure Mitigating System is used to mitigate an RCS transient—See Step 6.24.13.a. (**Surry**)
- Unscheduled outages—See Steps 6.27.1.a. and 6.27.2
- Dissolved gases in transformers exceed limits—See Step 6.28.2
- Conditions affecting the safety of Lake Anna Dam or its works—See Steps **6.3.2.i.** and 6.18.1
- Planned removal from service, and restoration to service, of Lake Anna Dam safety devices—See Step 6.18.8

**c. Operating Limitations**

- Technical Specification safety limit exceeded—See Steps **6.3.2.a.5.**, 6.10.2, 6.23.3 (**North Anna**), and 6.24.3 (**Surry**).
- Limiting Condition for Operation not met—See Steps **6.3.4.1.**, 6.10.2, and 6.10.11.
- Departure from license conditions or Technical Specifications permitted by 10 CFR 50.54(x)—See Steps **6.3.3.a.** and 6.10.11.
- Excess oxygen in waste gas holdup system—See Step 6.24.13.c. (**Surry**)
- Excessive quadrant to average power tilt—See Step 6.24.13.d. (**Surry**)

**d. Radiation or Exposure Events**

- Accidental criticality—See Steps **6.3.3.c.**, 6.17.1 and 6.27.2
- Personnel contamination—See Steps **6.3.2.a.4.**, 6.6.4, 6.17.1 and 6.27.2
- Radiation overexposures—See Steps **6.3.2.a.4.**, 6.6.4, 6.17.1 and 6.27.2
- Planned special exposures—See Step 6.6.5
- At receipt, contaminated or excessively radioactive packages—See Step **6.3.2.b.**
- Radioactive effluent releases—See Steps **6.3.2.a.4.**, **6.3.6.c.**, 6.6.4, 6.10.11, 6.10.16, 6.17.1, 6.26.2, 6.27.2, and 6.28.3
- Radioactive materials transport incident—See Steps **6.3.2.g.** and 6.28.3
- Twenty Four Hour Notification—See Step 6.3.6.a.1.
- Groundwater contamination—See Step **6.3.4** and Subsection 6.31.

**e. Security or Safeguards Events**

- Attempted or actual unauthorized entry—See Steps **6.3.3.f.**, 6.15.3 and 6.27.2
- Acts, attempts, or threats to interrupt normal operation—See Steps **6.3.3.e.**, 6.15.3 and 6.27.2
- Loss, theft, or attempted theft of special nuclear material—See Steps **6.3.2.a.3.**, **6.3.3.c.**, **6.3.3.e.**, 6.6.2.b., 6.15.3, 6.16.1 and 6.27.2
- Involving byproduct, source, or special nuclear material—See Steps **6.3.3.e.**, 6.6.2, and 6.15.3
- Attempted or actual introduction of contraband—See Steps **6.3.3.h.**, **6.3.6.b.**, 6.8.1
- Loss of shipment of special nuclear material or spent fuel—See Step **6.3.3.d.**
- Violations of requirements of NRC-approved physical security, guard training and qualification, and safeguard contingency plans

**f. Fitness for Duty Events**

- Significant Fitness for Duty events—See Steps **6.3.6.b.**, 6.8.1 and 6.27.2
- NRC employee suspected to be unfit for duty—See Step **6.3.2.c.**
- Drug and Alcohol testing Errors—See Step 6.8.3.

**g. Environmental Events**

- Toxic gas releases—See Steps **6.3.6.c.**, 6.26.2.b. (**North Anna**) and 6.27.2.a.
- Oil or hazardous material spills or releases—See Steps **6.3.2.d.**, **6.3.2.e.**, **6.3.6.c.**, 6.20.4, 6.26.2.b., 6.27.2.a., 6.27.3.l., and 6.27.3.n. (**North Anna**)
- Smoke releases from Station—See Step **6.3.4.b.**
- Significant increase in nuisance organisms or conditions (**North Anna**)—See Steps **6.3.6.c.** and 6.26.2
- Failure to comply with VPDES permit requirements—See Steps **6.3.2.f.**, **6.3.6.f.**, **6.3.6.e.**, 6.26.1.a. and 6.27.3.n.
- Unplanned bypass of waste treatment facilities—See Steps **6.3.6.f.** and 6.27.3.n.
- Unpermitted, unusual, or extraordinary discharge—See Steps **6.3.6.e.** and 6.27.3.n.
- Unanticipated or emergency discharge of waste water or chemical substances—See Steps **6.3.6.c.** (**North Anna**), **6.3.6.e.**, 6.26.2.b. (**North Anna**), 6.27.2 and 6.27.3.n.
- Bird of prey death or injury by electrocution—See Step 6.22.4
- Disturbance of an osprey nest—See Step 6.22.4
- Excessive bird impactions (**North Anna**)—See Step 6.26.2
- Fish kills—See Steps **6.3.6.c.**, 6.26.2.b. and 6.27.2 (**North Anna**)
- On-site plant or animal disease outbreaks—See Steps **6.3.6.c.**, 6.26.2.b. and 6.27.2 (**North Anna**)
- Mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973—See Steps **6.3.6.c.**, 6.26.2 and 6.27.2.a. (**North Anna**)

**h. ISFSI-Unique Events**

- A defect in any spent fuel storage cask structure, system, or component important to safety—See Step **6.3.5.a.7.**
- A significant reduction in the effectiveness of any spent fuel storage cask confinement system during use of the storage cask—See Step **6.3.5.a.7.**

**i. Miscellaneous Events or Conditions**

- Special circumstances that may be considered media significant—See Steps **6.3.4.a.4.**, 6.11.3, and 6.27.2.a.
- Unusual or unplanned occurrences that may be of concern to nearby residents—See Step 6.27.2.a.
- Station fires—See Steps 6.17.1, 6.27.2.a., 6.28.2 and 6.28.3
- Demonstrations, picketing, civil disturbances, strikes, work stoppages—See Steps **6.3.3.e.**, **6.3.4.a.4.**, and 6.27.2.a.
- Earthquakes, storms, floods, forest or brush fires—See Steps **6.3.2.i.**, 6.10.11, 6.18.1 (**North Anna**), 6.27.2.a. and 6.28.3
- Injuries or accidental deaths—See Steps **6.3.2.g.**, **6.3.5.c.**, 6.17.1 and 6.27.2.a.
- Transportation of contaminated injured person—See Step **6.3.5.a.5.**
- Deaths or serious injuries at, or alleged to be related to, Lake Anna Dam—See Steps **6.3.2.h.**, **6.3.5.c.**, 6.18.2 and 6.27.2.a. (**North Anna**)
- Transport incidents involving radioactive or hazardous materials—See Steps **6.3.2.g.**, 6.17.1, 6.21.2, and 6.28.3
- Unanalyzed condition that significantly compromises Station safety—See Step **6.3.5.2.**
- Failure to notify NRC of planned removal or significant changes to equipment that controls amount of radioactivity in effluents—See Step **6.3.6.d.** (**North Anna**)
- Ambulance transport of personnel to an off-site medical facility—See Step 6.27.2
- Mishaps involving low-level waste forms—See Step 6.29.5
- A failure to comply, potentially associated with a significant safety hazard—See Step 6.7.2
- Nonreceipt of hazardous waste shipment manifest from receiver—See Steps 6.20.7.b. and 6.27.3.b.
- Planned or emergency removal of asbestos or asbestos containing material—See Step 6.27.3.b.
- Actual or expected unavailability of licensed waste treatment operator—See Step 6.27.3.m.
- Pump and haul of bulk-storage-tank bottom waters—See Step 6.27.3.p. (**Surry**)
- Operation of auxiliary boiler—See Step 6.27.3.f. (**Surry**)
- Licensed material package effectiveness reduction or with safety-significant defects—See Step 6.13.3

## 6.2.2 Special Commitments; Administrative Matters

### a. Outages and Refueling

- Outages—See Steps 6.27.1.a. and 6.27.1.b.
- Refueling—See Step 6.23.8
- Removal of Reactor Vessel Material Surveillance Program coupons—See Step 6.10.15
- Restart after refueling, fuel movement, license modification authorizing a power level increase, or Station modifications—See Step 6.24.4 (**Surry**)
- Inservice inspections—See Steps 6.23.4, 6.23.7.a. (**North Anna**), and 6.24.5 (**Surry**)

### b. Legal & Commercial

#### 1. Program & Procedure Changes

- Changes to the security plans without prior NRC approval—See Step 6.10.5.b.
- Revisions to the Emergency Plan or implementing procedures without prior NRC approval—See Step 6.10.5.c.
- Changes to Chemical Test Program procedures.
- Significant changes in the operation of equipment that controls the amount of radioactivity in effluents (**North Anna**)—See Step 6.23.5.
- Changes in discharge or management of pollutants—See Step 6.27.3.j.
- Significant changes from upstream or downstream conditions addressed in the North Anna Hydroelectric Project Emergency Action Plan (**North Anna**)—See Step 6.18.4
- Decreased availability of private personnel or equipment to prevent or mitigate a worst-case oil release—See Step 6.27.3.l.

**2. Station Changes**

- Major changes to radioactive liquid, gaseous, or solid waste treatment systems—See Step 6.10.3
- Introduction of an extremely hazardous substance in an amount greater than its threshold planning quantity—See Step 6.20.9
- A change in type of product stored or handled at the Station for which an Material Safety Data Sheet (MSDS) has not been submitted—See Step 6.27.3.1.
- A substantial increase in the maximum oil storage capacity at the Station—See Step 6.27.3.1.

**3. Movement of Radioactive Materials**

- Shipment or receipt of SNM—See Steps 6.15.1, 6.15.2, 6.15.3, 6.15.4, and 6.16.3
- First use of radioactive material packaging—See Step 6.13.2

**4. NRC Licences, Orders, & Inspections**

- Change in operator or senior operator status—See Step 6.10.12
- Receipt of NRC notices of violation that involve radiological working conditions, proposed impositions of civil penalty, orders for imposing requirements, orders modifying, suspending, revoking a license, orders imposing a civil penalty, and responses thereto. See Steps 6.5.1.e. and 6.5.1.f.
- Issuance of an NRC shutdown order—See Step 6.28.6
- Issuance of Dominion Annual Report—See Steps 6.10.8 and 6.14.11
- Five years before expiration of reactor operating license—See Step 6.10.5.f.
- Three years before the predicted date that fracture toughness levels will no longer satisfy 10 CFR 50, App. G, Section IV.A—See Step 6.10.14.
- Suspension or revocation of an NRC operating license—See Step 6.28.6
- A change of licensee for the Station—See Step 6.27.3.1.

**5. Permits, Orders, & Evaluations**

- Proposed changes to the VPDES permit—See Step 6.26.1.b. **(North Anna)** or Step 6.27.3.o. **(Surry)**
- Changes or additions to the VPDES permit or State certification—See Step 6.26.1.b.**(North Anna)** or Step 6.27.3.o. **(Surry)**
- Stay of a VPDES permit or State certification appeal—See Step 6.26.1.b. **(North Anna)**
- Modifications to Lake Anna Dam or its works—See Step 6.18.3
- Suspension from INPO—See Step 6.28.5
- Classification as INPO Category 5—See Step 6.28.5

**6. Insurance & Financial**

- Material change in proof of financial protection or financial information previously filed—See Step 6.17.2
- Expiration, renewal, or replacement of 10 CFR 140 financial protection—See Step 6.17.3
- Filing of Chapter 11 petition by or against any component of Dominion Resources—See Step 6.10.5.g.

**c. Individual Requests or Directives**

- Worker and former worker radiation exposure data—See Steps 6.5.2 and 6.5.3.
- Radiation overexposures—See Step 6.5.4.
- Terminating employees & workers—See Step 6.5.5.



### 6.3 Immediate to 72-Hour Notifications

This subsection consolidates requirements for situations or events addressed by Subsections 6.5 through 6.29, for which notifications or reports are required within 72 hours.

#### 6.3.1 General Requirements

- a. When this subsection (Subsection 6.3) designates someone other than the Shift Manager or a member of Station management to notify a government agency, that person shall ensure the Shift Manager or a member of Station management is advised before making the notification. See also Step 6.3.4.a.4.

**NOTE:** Notifications for events that exceed an Emergency Action Level, as specified in EPIP-1.01, Emergency Manager Controlling Procedure, are controlled by EPIP-2.01, Notification of State and Local Governments and EPIP-2.02, Notification of NRC. See also Steps 6.3.5 and 6.3.7. [10 CFR 50.72(a)(3), 10 CFR 50.72(c)(1), 10 CFR 50.72(c)(2)]

**NOTE:** When it is discovered that an event or condition had existed, but the basis for the emergency class no longer exists at the time of this discovery and no other reasons exist for an emergency declaration, then declaration of an emergency class is not required. See Step 6.3.3.i. for notification requirements.

- b. For events reportable to the NRC Operations Center, the Shift Manager shall:
  1. Complete NRC Form 361, Event Notification Worksheet.
  2. Fax the Event Notification Worksheet to the NRC Operations Center. See Step 6.1.1.
  3. Using the Emergency Notification System (ENS), verify that NRC received the fax.
  4. Be prepared to read the entire contents of the Event Notification Worksheet to the NRC Operations Center officer.
  5. Ensure the NRC Operations Center officer has a clear understanding of the issues, and that all questions regarding the notification have been answered.
  6. If the ENS is nonfunctional, use commercial telephone service, other dedicated telephone service, or any other method that ensures the NRC Operations Center is notified as soon as practical. See Step 6.1.1. [10 CFR 50.72(a)(2)]

7. Maintain an open, continuous communications channel with the NRC Operations Center, when requested by NRC. [10 CFR 50.72(c)(3) & 10 CFR 73.71(a)(3)]
- c. For events that are reportable in accordance with 10 CFR 50.72 and 10 CFR 72.75:
- Immediately, the Shift Manager shall notify the Manager Nuclear Operations or the Operations Manager On Call, and the STA
  - Within one hour, the Manager Nuclear Operations or Operations Manager On Call shall notify the Site Vice President and the Plant Manager (Nuclear)
  - Within one hour, the STA shall notify the Director Nuclear Station Safety and Licensing
  - Within one hour, the Director Nuclear Station Safety and Licensing (if absent, the Plant Manager (Nuclear)) shall notify the Manager Nuclear Oversight of reactor trips; for other events that are reportable in accordance with 10 CFR 50.72 and 10 CFR 72.75, this notification shall be made within 24 hours
  - Within 24 hours, the Director Nuclear Station Safety and Licensing (if absent, the Plant Manager (Nuclear)) shall notify the NRC Resident Inspector.
  - Within 24 hours, the Director Nuclear Station Safety and Licensing (if absent, the Plant Manager (Nuclear)) shall notify the Director NL&OS
  - Within 24 hours, the Site Vice President, a Director, Manager Nuclear Operations, or Shift Manager shall notify the Senior Vice President Nuclear Operations
  - When notified, the Director NL&OS shall promptly notify appropriate corporate organizations, including Public Relations, Medical, Corporate Risk Management, and Power Supply, as applicable

### 6.3.2 Immediate Notifications

**NOTE:** Some conditions, indicated by “See EPIP-1.01,” may exceed an Emergency Action Level (EAL) as specified in EPIP-1.01, Emergency Manager Controlling Procedure. If a condition exceeds an EAL, Emergency Plan Implementing Procedures (EPIPs) control State and Federal agency notifications. If an event or condition does not exceed an EAL, it may still be reportable in accordance with this procedure.

**NOTE:** Upon NRC request, the designated responsible person must maintain an open, continuous communications channel with the NRC Operations Center. [10 CFR 50.72(c)(3)]

- a. The Shift Manager shall notify the NRC Operations Center via the ENS of:
  1. Any further degradation in the level of safety of the plant or other worsening plant conditions, after telephone notifications to NRC as specified in Step 6.3.2 or Step 6.3.3. See EPIP-1.01. [10 CFR 50.72(c)(1)]
  2. The results of ensuing evaluations or assessments of plant conditions, the effectiveness of response or protective measures taken, and information related to plant behavior that is not understood, after telephone notifications to NRC as specified in Step 6.3.2 or Step 6.3.3. [10 CFR 50.72(c)(2)]
  3. Lost, stolen or missing licensed material in an aggregate quantity equal to or greater than 1,000 times the quantity specified in 10 CFR 20, Appendix C, under circumstances in which it appears persons in unrestricted areas could be exposed. See also Steps 6.6.2.b. and 6.6.2.c. [10 CFR 20.2201(a)(i)]

**NOTE:** The requirements of Step 6.3.2.a.4. do not apply to doses that result from planned special exposures, that are within the limits for planned special exposures, and that are reported in accordance with Step 6.6.5. [10 CFR 20.2202(e)]

4. Events that involve by-product, source, or special nuclear material possessed by Dominion that may have caused or threatens to cause: [10 CFR 20.2202(a)]
  - An individual to receive:
    - A total effective dose equivalent of  $\geq 25$  rems
    - An eye dose equivalent of  $\geq 75$  rems
    - A shallow-dose equivalent to the skin or extremities of  $\geq 250$  rads
  - Release of radioactive material inside or outside a restricted area, so that, if an individual had been present for 24 hours, they could have received an intake five times the occupational annual limit on intake

If the event involves radiological overexposure, the DEM shall be notified as specified in Step 6.27.2. See also Step 6.6.3.c.

5. A Technical Specifications safety limit violation. See also Steps 6.23.3 (**North Anna**) and 6.24.3 (**Surry**). [10 CFR 50.36(d)(1)(i)(A)]
  6. Upon declaration of an emergency as specified in the approved emergency plan regarding ISFSI events. [10 CFR 72.75(a)]
- b. If:
- Removable radioactive surface contamination exceeds the limits of 10 CFR 71.87(i) [10 CFR 20.1906(d)(1)]
  - or**
  - External radiation levels exceed the limits of 10 CFR 71.47 [10 CFR 20.1906(d)(2)]
1. Radiological Protection shall notify Supervisor Licensing (Station) and the Shift Manager.
  2. Radiological Protection or Supervisor Licensing (Station) shall notify (see Step 6.3.1.a.) the final delivering carrier and, by telephone and telegram, mailgram, or facsimile, the NRC Operations Center. See Step 6.1.1.

3. The notifier in Step 6.3.2.b.2. shall initiate a Condition Report as specified in PI-AA-200, including documentation of its notifications on the Condition Report.
- c. If an NRC employee or NRC Contractor is believed to be under the influence of any substance or otherwise unfit for duty, the Fitness for Duty Administrator (Station) or a Station Management staff member shall notify (see Step 6.3.1.a.) the NRC Regional Administrator by telephone followed by written notification (e.g., e-mail or fax). If the Regional Administrator cannot be reached, notification shall be made to the NRC Operations Center. [10 CFR 26.77(c)]

**NOTE:** Use Table 1, Summary of Reporting Requirements for Non-Radiological Releases To the Environment, to supplement Step 6.3.2.d. for reporting requirements. The Environmental Compliance Coordinator or Electric Environmental Services should be consulted when assessing oil release reportability.

- d. If oil may have been released from the Station into state waters that:
- Violates applicable water quality standards (i.e., **any** oil in water) [40 CFR 110.3]
  - Causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines [40 CFR 110.3]
  - Causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines [40 CFR 110.3]

**or**

If oil can reasonably be expected to enter, or there is a substantial threat that oil will enter, state waters or storm drains (**Reference 3.1.8**)

**or**

If more than 25 gallons<sup>1</sup> of oil has been or can reasonably be expected to be released to soil, including a spill within containment facilities<sup>2</sup> (**Reference 3.1.8**):

**or**

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1. Notice is considered to have been given to the State Water Control Board for oil releases to the ground up to 25 gallons if and only if the Environmental Compliance Coordinator prepares and maintains a record of such oil releases for five years, and the oil is cleaned up.

2. Oil tank dikes and transformer vaults are typical containment facilities.

**Table 1**  
**Summary of Reporting Requirements for Non-Radiological Releases To the Environment<sup>a</sup>**

Material	Released To		Amount <sup>b</sup>	Report To <sup>c</sup>	See
Oil	Soil	Outside containment facilities <sup>d</sup>	> 25 gallons	DEQ & LEPC	6.3.2.d.
	Solid surface	Potential to reach soil or water	Case basis		
	State Waters <sup>e</sup>		Any discernible amount <sup>k</sup>	NaRC, DEQ & LEPC	
Hazardous Substance <sup>f, g</sup>	Land	Off-site	≥ RQ	NaRC, DEQ & LEPC	6.3.2.e, 6.3.2.g. <sup>h</sup>
	Water	On-site <sup>i</sup>	< RQ	DEQ	
			≥ RQ	NaRC, DEQ, & LEPC	
	Off-site		< RQ	DEQ	
			≥ RQ	NaRC, DEQ,	
Hazardous Waste <sup>j</sup>	Land	On-site <sup>i</sup>	≥ RQ	NaRC & DEQ	6.3.2.e, 6.3.2.g. <sup>h</sup>
		Off-site	Any amount	NaRC, DEQ & LEPC	
	Water	On-site <sup>i</sup>	< RQ	DEQ	
			≥ RQ	NaRC, DEQ, & LEPC	
			Any amount	NaRC, DEQ, & LEPC	

- a. Step 6.3.2.e. explains “releases to the environment” when hazardous substances or hazardous wastes are involved.  
For oil, “releases” includes spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, leaching, or disposing. Oil releases solely within a workplace (an enclosed building with a concrete floor) are not subject to the RQ unless oil reaches a floor drain connected to a pathway to the environment. All outdoor releases are subject to the RQ.
- b. RQ = reportable quantity as specified in VPAP-2202, Control of Chemicals and Hazardous Substances.
- c. DEQ = State Department of Environmental Quality; NaRC = National Response Center\*; LEPC = Local Emergency Planning Coordinator. \*At Surry, if the NaRC is notified, the U.S. Coast Guard must also be notified. DEM (Department of Emergency Management (Emergency Operations Center)) is notified (instead of DEQ) on nights, weekends, and after hours. Environmental “immediate notification” is defined as “as soon as possible, but not to exceed 24 hours.” Phone numbers for the agencies are found in 6.1.1. Attachment 1, Oil or Hazardous Substance Release Report, should be used for spill information requested by the agencies. NRC notification is required within 4 hours of notifying any of these agencies.
- d. Oil tank dikes and transformer vaults are typical containment facilities.
- e. Includes releases to storm drains or comparable conduits to state waters. See also 4.36, State Waters.
- f. Hazardous substances of concern to the Station are identified in VPAP-2202, Control of Chemicals and Hazardous Substances.
- g. See Footnote 1. on page 73 if there is an on-site RQ release of a volatile substance.
- h. 6.3.2.g. is applicable for transportation-related events.
- i. An on-site hazardous material spill that, due to location, size, or substance properties, poses imminent or likely danger of an RQ release to the environment, must be reported to the same entities as offsite spills.
- j. Hazardous waste is defined in the Environmental Protection Plan.
- k. **If the oil spill that reaches navigable waters is: a) greater than 1000 gallons or b) the second spill that is greater than 42 gallons in a 12 month period, then contact Electric Environmental Services (EES). Additional reporting by EES to the EPA will be required. [Commitment 3.2.26]**

If any spill reaches a solid surface, including surfaces inside secondary containment systems and inside buildings, and (1) if there is the potential for oil to reach surface water, and/or (2) if there is the potential for greater than 25 gallons of oil to reach soil

1. The individual who observes or suspects such an event or condition shall notify the Shift Manager.
2. The Shift Manager shall notify the Manager Nuclear Operations, the Environmental Compliance Coordinator, or Environmental Policy & Compliance, as available.
3. If the discharge is to storm drains or state waters, the Environmental Compliance Coordinator or Electric Environmental Services (see Step 6.3.1.a.) (**North Anna**) the Shift Manager (**Surry**) shall notify the National Response Center, the State Department of Environmental Quality (Water) (DEQ), the LEPC, and (**Surry**) the U.S. Coast Guard. If the discharge is to land, DEQ and the LEPC shall be notified. Notifications shall be documented on Attachment 1, Oil or Hazardous Substance Release Report. See 6.1.1.a. See also Steps 6.3.4.a.4., 6.20.4, and 6.27.3.n.<sup>3</sup>

**NOTE:** The Environmental Compliance Coordinator or Electric Environmental Services should be consulted when assessing hazardous material release reportability.

e. If a regulated, hazardous material release to the environment<sup>1</sup> exceeds a reporting threshold as specified in Table 1<sup>2</sup>:

1. The individual who becomes aware of the release or potential release shall notify the Shift Manager. See EPIP-1.01.

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1. Reportable Quantity (RQ) is the amount of a regulated, hazardous material *released to the environment* during a 24-hour period that must be reported in accordance with federal agency requirements. RQ only applies to a release to the environment, so will not apply for every release of a regulated, hazardous material. For example, a hazardous substance spill that is contained *entirely* on-site, even if more than the RQ, is **not** reportable because it is not a release to the environment. However, if an RQ amount evaporates or is absorbed in soil, the spill has not been contained entirely on-site, and thereby becomes a reportable release to the environment.

If the VPDES or other permit authorizes discharge of a hazardous material, a discharge is **not** reportable as a release to the environment unless a discharge amount or concentration exceeds the permit-authorized limit or the discharge is via a pathway not specified during the permit application and approval process. Permit-authorized discharges are reportable only as required by the applicable permit (e.g., the monthly Discharge Monitoring Report, per Step 6.27.3.i., required by the VPDES permit).

If an amount or concentration does exceed a permit-authorized limit or is discharged via a pathway other than specified during the permit application and approval process, the RQ and associated reporting requirements will apply.

2. The Shift Manager shall notify the Manager Nuclear Operations, the Environmental Compliance Coordinator, or Electric Environmental Services, as available.
3. The Environmental Compliance Coordinator or Electric Environmental Services (see Step 6.3.1.a.) (**North Anna**) Shift Manager (**Surry**) shall notify the agencies listed in the “Report To” column of Table 1. If a reportable release involves off-site transportation (including storage incident to such transportation), the Shift Manager shall also notify the 911 operator, local and state police, and the National Response Center. Notifications shall be documented on Attachment 1, Oil or Hazardous Substance Release Report. See Step 6.1.1.a. See also Steps 6.3.2.g., 6.3.4.a.4., 6.22.3.b. and 6.27.3.n.

[CERCLA Sec. 304(b)(1); 40 CFR 302]

**NOTE:** Items marked with an asterisk(\*) on Attachment 1 are required to be reported to the response agencies listed in block 10 of the attachment. (**Reference 3.1.106**)

4. Notifications shall include (to the extent known) [CERCLA Sec. 304(b)(2)]:
  - The chemical name or identity of the substance involved in the release
  - Whether the substance is on the list referred to in section 302(a) of CERCLA, 40 CFR 302.
  - An estimate of the quantity of substance released to the environment
  - The time and duration of the release
  - The medium or media into which the release occurred
  - Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals
  - Proper precautions to take as a result of the release, including evacuation
  - The name and telephone number of the Dominion contact

- 
2. Table 1 does not mention PCBs because no PCBs are in use at the Station. The Environmental Compliance Coordinator or Electric Environmental Services should be contacted for further instructions if any question arises concerning PCBs being introduced on-site and any consequent reporting.
  3. If the discharge occurs in the Main Switchyard the Dominion System Operator Transmission shall be notified. If the discharge is from the transformer belonging to Rappahannock Electric Cooperative at the Dam then that company shall be notified (**North Anna**)



f. If the Station does not comply with one or more limitations, standards, monitoring, or management requirements specified in the VPDES permit (if oil is involved, go to Step 6.3.2.d.; if hazardous materials are involved, go to Step 6.3.2.e.) and such noncompliance:

- May adversely affect State waters

or

- May endanger public health<sup>1</sup>

As soon as possible, the Environmental Compliance Coordinator or Electric Environmental Services shall notify (see Step 6.3.1.a.) the State Department of Environmental Quality (Water) by telephone with the following information

[VPDES Permit]:

- A description and cause of noncompliance
- The period of noncompliance, including exact dates and times or anticipated time when the noncompliance will cease
- Actions taken or planned to reduce, eliminate, and prevent recurrence

See also Steps 6.3.4.a.4., 6.27.2.a.1., and 6.27.3.n.

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1. Applicable regulations use, but do not define, the terms “adversely affect” and “endanger public health.” These terms must be interpreted on a case-by-case basis by individuals with aquatic ecology expertise and thorough familiarity with current regulatory agency reporting and enforcement policy. Such individuals will also determine how soon a specific event must be reported to avoid enforcement (i.e., within minutes of an event, or some longer time within the not-to-exceed 24-hour limit established by the VPDES Permit).

- g. If an incident occurs during transport (including loading, unloading, and temporary storage) of:
- Radioactive materials in which fire, breakage, spillage, or suspected radioactive contamination occurs (see also Step 6.28.3) [49 CFR 171.15(b)(2)]
  - Hazardous materials in which any of the following is a direct result of the hazardous materials: [49 CFR 171.15(b)(1)]
    - A person is killed
    - A person requires hospitalization because of injuries
    - An evacuation of the general public occurs lasting one or more hours
    - One or more major transportation arteries or facilities are closed or shut down for one hour or more
    - The operational flight pattern or routine of an aircraft is altered
  - A situation exists (e.g., a continuing danger to life exists at the scene of the incident) that, in the judgment of the carrier or Dominion, should be reported even though it does not meet one of the previous criteria [49 CFR 171.15(b)(5)]

Supervisor Licensing (Station) shall notify (see Step 6.3.1.a.) DOT by telephone, or confirm carrier notification of DOT by telephone. See also Steps 6.3.2.e. and 6.21.2. The notification shall include the [49 CFR 171.15(a)]:

- Notifier's name
- Name and address of carrier represented by the notifier
- Phone number where the notifier can be contacted
- Date, time, and location of incident
- The extent of injuries, if any
- Classification, name, and quantity of radioactive or hazardous materials involved, if available
- Type of incident and nature of radioactive or hazardous material involvement and whether a continuing danger to life exists at the scene

- h. If a serious accident or a death occurs at or immediately above or below Lake Anna Dam<sup>1</sup> or is alleged to be related to the existence or operation of the dam:
    - 1. The Lake Anna Dam Operator shall notify the Shift Manager and provide information necessary to prepare Attachment 2, FERC Public Safety Database Report.
    - 2. The Shift Manager shall initiate a Condition Report in accordance with PI-AA-200.
    - 3. The Shift Manager should notify the FERC Regional Engineer of the condition by telephone. See Step 6.1.1.a. See also Steps 6.3.4.a.4., 6.3.5.c., and 6.18.2.b. **(North Anna)**
  - i. If a condition is identified that affects the safety of Lake Anna Dam or its associated works (see Subsection 4.8), but does not require entry into the North Anna Hydroelectric Project Emergency Action Plan:
    - 1. The Lake Anna Dam Operator shall notify the Shift Manager and provide relevant supporting information.
    - 2. The Shift Manager shall notify, by telephone, the FERC Regional Engineer of the condition and initiate a Condition Report in accordance with PI-AA-200. See Step 6.1.1.a. See also Steps 6.3.4.a.4. and 6.18.1.b. **(North Anna)**
- [18 CFR 12.10(a)]

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1. Incidents which involve other parts of the lake are excluded. [18 CFR 12.10(b)(4)]

### 6.3.3 One-hour Notifications

**NOTE:** Some conditions, indicated by “See EPIP-1.01,” may exceed an Emergency Action Level (EAL) as specified in EPIP-1.01, Emergency Manager Controlling Procedure. If a condition exceeds an EAL, EIPs control State and Federal agency notifications. If an event or condition does not exceed an EAL, it may still be reportable in accordance with this procedure.

As soon as practical, but within one hour, the Shift Manager, Station Emergency Manager, or Site Vice President shall notify the NRC Operations Center of:

- a. Deviation from Technical Specifications (permitted by 10 CFR 50.54(x)) to protect the health and safety of the public, when no action consistent with license conditions and Technical Specifications can provide adequate or equivalent protection. [10 CFR 50.72(b)(1)]
- b. An automatic safety system that does not function as required during operation. See EPIP-1.01. [10 CFR 50.36(d)(1)(ii)(A)]

**NOTE:** Notifications required by Steps 6.3.3.c., 6.3.3.d., and 6.3.3.e., are exempt from the requirement that Safeguards Information be transmitted only by protected telecommunications circuits approved by NRC.

- c. An accidental criticality or loss of SNM. See EPIP-1.01.  
[10 CFR 70.52 (a), 10 CFR 72.74(a), 10 CFR 74.11a]

**NOTE:** Step 6.3.3.d. notifications need not duplicate Step 6.3.3.e. notifications.

[10 CFR 74.11(c), 10 CFR 72.74(c)]

d. A loss of any [10 CFR 73.71(a)(1), 10 CFR 73.67(e)(3)(vii), 10 CFR 73.67(g)(3)(iii)]:

- SNM shipment
- Spent fuel shipment

**or**

Availability of supplemental information after initial notification. [10 CFR 73.71(a)(5)]  
(See also Step 6.15.3.a.3.)

**or**

Recovery of or accounting for such lost shipment.

See also Step 6.15.3.a.2. [10 CFR 73.71(a)(1), 10 CFR 73.67(e)(3)(vii), 10 CFR 73.67(g)(3)(iii)]

**NOTE:** Steps 6.3.3.e., 6.3.3.f., 6.3.3.g., 6.3.3.h.notifications need not duplicate Step 6.3.3.d. or 10 CFR 50.72 notifications. [10 CFR 72.74(c), 10 CFR 73.71(e), 10 CFR 74.11(c)]

e. A reason to believe that a person has committed or caused, or attempted to commit or cause, or has made a credible threat to commit or cause (See also Step 6.15.3.b.2.).

[10 CFR 73.71(b)(1), 10 CFR 73 App. G.I, 10 CFR 70.52 (a), 10 CFR 72.74(a), 10 CFR 74.11(a)]:

- Theft, loss, or unlawful diversion of SNM
- Significant physical damage to the Station, nuclear fuel, or carrier of nuclear fuel
- Interruption of normal operation through unauthorized use of or tampering with its machinery, components, or controls, including the security system

f. Unauthorized entry into a protected area, material access area, controlled access area, vital area, or transport.

g. Failure, degradation, or the discovered vulnerability in a safeguard system that could allow unauthorized or undetected access to a protected area, controlled access area, vital area, or transport for which compensatory measures have not been employed.

**NOTE:** Fitness-for-duty events are reported in accordance with 10 CFR 26 instead of 10 CFR 73.71. See Steps 6.3.6.b. and 6.8.1. [10 CFR 26.73(c)]

- h. Actual or attempted introduction of contraband into a protected area, material access area, or transport.
- i. Discovery that an undeclared or misclassified event or condition met all the following criteria: [10 CFR 50.72(a)(1)(i)]
  - Exceeded an Emergency Action Level (EAL) as specified in EPIP-1.01, Emergency Manager Controlling Procedure
  - The basis for the emergency class no longer exists at the time of discovery
  - No other reasons exist for an emergency declaration

In addition, the following shall be notified:

- Department of Emergency Management (at approximately the same time)
- Director Nuclear Protection Services and Emergency Preparedness
- Louisa/Surry County Administrator

#### 6.3.4 Four-hour Notifications

**NOTE:** Some conditions, indicated by “See EPIP-1.01,” may exceed an Emergency Action Level (EAL) as specified in EPIP-1.01, Emergency Manager Controlling Procedure. If a condition exceeds an EAL, EIPs control State and Federal agency notifications. If an event or condition does not exceed an EAL, it may still be reportable in accordance with this procedure.

- a. As soon as practical, but within four hours, the Shift Manager shall notify the NRC Operations Center via the ENS of:

**NOTE:** If a unit enters a limiting condition for operation (LCO) and a unit shutdown is started due to the LCO, the event is reportable even if shutdown is not completed. LCOs terminated by a unit shutdown for an unrelated reason are still reportable if the condition would not have been corrected within the LCO time limit for shutdown.

1. Initiation of plant shutdown (reduction of power or temperature) required by Technical Specifications. The initiation of plant shutdown does not include mode changes required by Technical Specifications if initiated after the plant is already in a shutdown condition. See EPIP-1.01. [10 CFR 50.72(b)(2)(i), 10 CFR 50.36(d)(1)(i)(A), 10 CFR 50.36 (d)(2)(i), NUREG 1022 Item 3.2.1]
2. Any event that results or should have resulted in ECCS discharge into the RCS as a result of a valid signal except when the actuation results from and is part of a pre-planned sequence during testing or reactor operation. [10 CFR 50.72(b)(2)(iv)(A)]
3. Any event or condition that results in actuation of the reactor protection system (RPS) when the reactor is critical except when actuation results from and is part of a pre-planned sequence during testing or reactor operation.  
[10 CFR 50.72(b)(2)(iv)(B)]

**NOTE:** “Notification to other government agencies has been or will be made” is not necessarily an automatic notification to the NRC. Refer to NUREG – 1022, Event Reporting Guidelines 10 CFR 50.72 and 50.73, for discussions and examples or contact Station Licensing if clarification is needed. [NUREG-1022, Section 3.2.12]

4. Any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned, or notification to other government agencies has been or will be made. Such an event may include an onsite fatality or inadvertent release of radioactively contaminated materials. [Commitment 3.2.12] [10 CFR 50.72(b)(2)(xi)]

5. ISFSI Non-emergency Four-Hour Notifications shall include, if available at time of notification: [10 CFR 72.75(e)(3)]
  - The caller's name and call back telephone number
  - A description of the event, including time and date
  - The exact location of the event
  - The quantities, and chemical and physical forms of the spent fuel, HLW or reactor related Greater than Class C (GTCC) waste involved
  - Any personnel radiation exposure data
6. An action taken in an emergency that departs from a license condition, technical specification, or certificate of compliance when the action is immediately needed to protect the public health and safety and no licensed action that provides adequate or equivalent protection is immediately apparent—see Step 6.14.7.f. [10 CFR 72.75(b)(1)]
7. An event at the ISFSI that requires unplanned medical treatment at an offsite medical facility of an individual with radioactive contamination on the individual's clothing or body which could cause further radioactive contamination. [10 CFR 72.75(e)(3)]
8. Groundwater Protection Voluntary Communication Notifications to other government agencies may be reportable under 10 CFR 50.72(b)(2)(xi) requirement for a 4-hour notification to the NRC operations center based upon the following guidance:
  - If a licensee is notifying a local, state, or other federal agency in accordance with an existing law, regulation, or ordinance, then the licensee should make its notification to the NRC under the 50.72 notification requirement.
  - If a licensee is informally communicating with a local, state, or other federal agency (i.e., not under a specific law, regulation or ordinance), then the licensee has discretion as to whether to informally communicate with NRC (e.g., through the site resident inspector and/or regional NRC office) or formally through the 50.72 notification process. If due to the site-specific circumstances or heightened sensitivity to the issue at that site, the issue is likely to produce strong media interest, then the licensee should consider notifying NRC under the 50.72 requirement because this is actually the underlying intent of the regulation.



- b. Any person at the Station who observes smoke originating from Station equipment being released into the outdoor atmosphere shall notify the Shift Manager as soon as possible.
  1. If the smoke is not from a fire and there are no certified visible emissions evaluators available to determine the opacity of the smoke being released to the outdoor atmosphere, the Shift Manager or other Station personnel shall take the appropriate steps to determine the source, cause, and duration of the smoke being released.
    - Once all of the pertinent information regarding the release of smoke has been obtained, the Electric Environmental Services (ESS) must be notified immediately.
    - The ESS will report the release of smoke into the outdoor atmosphere to the appropriate DEQ regional office as soon as practical, but no later than four daytime business hours of the occurrence, with all of the pertinent information. If the DEQ regional office determines that it is necessary to obtain smoke readings after receiving all of the pertinent information, the ESS will dispatch a certified visible emissions evaluator to the Station to determine the opacity of the smoke being released into the outdoor atmosphere.
  2. The ESS will prepare and submit any written reports to the DEQ regional office regarding the release of smoke into the outdoor atmosphere.

#### 6.3.5 **Eight-hour Notifications**

- a. As soon as practical, but within eight hours, the Shift Manager shall notify the NRC Operations Center via the ENS of:
  1. Any condition that results in the condition of the Station, including its principal safety barriers, being seriously degraded. [10 CFR 50.72(b)(3)(ii)(A)]
  2. Any event or condition that results in the Station being in an unanalyzed condition that significantly degrades plant safety. [10 CFR 50.72(b)(3)(ii)(B)]

3. Any event or condition that results in valid actuation of any of the following systems, except when the actuation results from and is part of a pre-planned sequence during testing or reactor operation: [10 CFR 50.72(b)(3)(iv)(A)]
  - Reactor Protection System (RPS) - (RPS actuation with the reactor critical may be reportable within 4 hours under 10 CFR 50.72(b)(2)(iv)(B), see Step 6.3.4.a.3.)
  - General containment isolation signals affecting containment isolation valves in more than one system or multiple Main Steam Isolation Valves (MSIVs)
  - Emergency Core Cooling Systems (ECCS) including HHSI and LHSI (Actual discharges are reportable within 4 hours under 10 CFR 50.72(b)(2)(iv)(A), see Step 6.3.4.a.2.)
  - Auxiliary Feedwater System
  - Containment heat removal and depressurization systems including Containment spray and fan cooler systems
  - Emergency Diesel Generators (EDGs)
4. Any event or condition that at the time of discovery could have prevented the fulfillment of the safety function of structures or systems that are needed to:
  - Shut down the reactor and maintain it in a safe shutdown condition
  - Remove residual heat
  - Control the release of radioactive material; or
  - Mitigate the consequences of an accident. See EPIP-1.01. [10 CFR 50.72(b)(3)(v)]
5. Any event requiring the transport of a radioactively contaminated person to an off-site medical facility for treatment. See also Step 6.27.2. [10 CFR 50.72 (b)(3)(xii)]  
Could also be a 4 hour report in accordance with 10 CFR 72.75 (b)(5).

6. An event that results in a major loss of emergency assessment capability<sup>1</sup>, off-site response capability, or off-site communications capability, e.g., unavailability of any of the following (see Attachment 3, Emergency Response Unavailability, for unavailability criteria)<sup>2</sup>:

- Safety Parameter Display System<sup>3</sup> (SPDS)
- Emergency response facilities<sup>4</sup> (see Subsection 4.15)
- Emergency communications facilities and equipment<sup>5</sup>
- Prompt Notification System, including sirens
- Plant monitors necessary for accident monitoring

See EPIP-1.01. [10 CFR 50.72(b)(3)(xiii)]

7. Any instance of:

- A defect in any spent fuel storage cask structure, system, or component that is important to safety [10 CFR 72.75(c)1]

**or**

- A significant reduction in the effectiveness of any spent fuel storage cask confinement system during use of the storage cask [10 CFR 72.75(c)2]

See EPIP-1.01.

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1. A major loss of emergency assessment capability includes events that significantly impair fulfillment of the Emergency Plan, including safety assessment capability (e.g., loss of a significant portion of Control Room indications). Loss of on-site meteorological information does not constitute a major loss of assessment capability and should not be reported under this part.

2. Engineering judgment may be needed to assess the significance of losing certain equipment.

3. The SPDS is one function of the Plant Computer System (PCS). Unavailability of the SPDS can result from malfunctions ranging from those limited to the SPDS only, to those that cause a total loss of the PCS. Unavailability of only the SPDS, whether from a limited malfunction or a total loss of PCS, for less than eight hours is not reportable; but, unavailability of SPDS (up to and including a total loss of the PCS) along with unavailability of other assessment capability at the same time may be reportable. Scheduled PCS outages or operation of the PCS in the Simulator mode are not reportable if the SPDS can be made available in less than one hour (the time frame of one hour is commensurate with the required time for activation of an Emergency Response Facility, when required). [Reference 3.1.104]

4. EOF loss is reportable only if **both** the LEOF **and** the CEOF are unavailable.

5. A momentary loss of off-site response capability or emergency communications (e.g., the backup power supply fails while security computer and emergency communications are temporarily connected to perform a surveillance test) is **not** reportable.

- b. If an Alert, Site Area Emergency, or General Emergency is declared:
1. The Station Coordinator Emergency Preparedness shall prepare a Summary Report from information in completed Emergency Plan Implementing Procedures, Control Room logs, and interviews with persons involved with the declaration and response, as appropriate. See Attachment 6, Example DEM Summary Report.
  2. The Site Vice President, Director Nuclear Station Safety and Licensing, or Plant Manager (Nuclear) shall approve the report.
  3. Within 8 hours after termination of the event, Nuclear Emergency Preparedness shall ensure the report is delivered to the State Coordinator of the Virginia Department of Emergency Management. [NAEP 4.4; SEP 4.4]
- c. If, on Dominion property or at Lake Anna Dam, there is a Dominion employee or contractor fatality (regardless of the time between the injury and death, or the length of an illness) or an event in which three or more Dominion employees or contractors are hospitalized:
1. The Shift Manager shall notify Supervisor Nuclear Site Safety (Station) with the following information:
    - Number of fatalities
    - The employer of those killed
    - The circumstances of the event
    - The extent of injuries
  2. Nuclear Site Safety (Station) shall notify OSHA as specified in Step 6.3.5.c.3. See also Step 6.3.4.a.4.
  3. Within eight hours after the occurrence, the Supervisor Nuclear Site Safety (Station) (as specified in Step 6.3.5.b.2.) shall notify See Step 6.3.1.a.) the Area Director of OSHA by telephone or facsimile. See Step 6.1.1.a. See also Step 6.3.4.a.4. [29 CFR 1904.8]

- d. Whenever fire protection systems, portions of a system, or equipment are impaired or reduced in status for other than scheduled maintenance or scheduled testing activities (meaning an unplanned failure or state of degradation), the Shift Manager shall notify the Supervisor Nuclear Site Safety (Station). [**Commitment 3.2.17**]  
(Surry)

North Anna notification to the Supervisor Nuclear Site Safety (Station) is within 48 hours per TRM requirements.

#### 6.3.6 Twenty-four Hour Notifications

- a. As soon as practical, but within 24 hours, the Shift Manager shall notify the NRC Operations Center with the ENS of [10 CFR 20.2202(b)]:

**NOTE:** The requirements of Step 6.3.6.a.1. do not apply to doses that result from planned special exposures, that are within the limits for planned special exposures, and that are reported in accordance with Step 6.10.11.c. [10 CFR 20.2202(e)]

1. An event that involves licensed material possessed by Dominion that may have caused or threatens to cause:
  - An individual to receive, in a period of 24 hours:
    - A total effective dose equivalent exceeding 5 rems
    - An eye dose equivalent exceeding 15 rems
    - A shallow-dose equivalent to the skin or extremities exceeding 50 rems
  - Release of radioactive material inside or outside a restricted area, so that, if an individual had been present for 24 hours, they could have received an intake in excess of one occupational annual limit on intake.

If an event involves radiological overexposure, DEM must be notified as specified in Step 6.27.2. See also Step 6.6.3.c.

2. ISFSI Twenty-Four Hour Notifications shall include, if available at time of notification: [10 CFR 72.75(e)(3)]
  - The caller's name and call back telephone number
  - A description of the event, including time and date
  - The exact location of the event
  - The quantities, and chemical and physical form of the spent fuel or HLW involved
  - Any personnel radiation exposure data
3. An unplanned contamination event that requires access to the contaminated area by workers or the public to be restricted for more than 24 hours by imposing additional radiological controls or by prohibiting entry into the area [10 CFR 72.75(c)(1)]
4. An event in which safety equipment is disabled or fails to function as designed when: [10 CFR 72.75(d)(1)]
  - The equipment is required by regulation, license condition, or certificate of compliance to be available and operable to prevent releases that could exceed regulatory limits, to prevent exposure to radiation or radioactive materials that could exceed regulatory limits, or to mitigate the consequences of an accident,  
and
  - No redundant equipment was available and operable to perform the required safety function
5. An event that prevents immediate actions necessary to avoid exposures to radiation or radioactive material that could exceed regulatory limits or releases of radioactive materials that could exceed regulatory limits (e.g., events such as fires, explosions, and toxic gas releases)—see Step 6.14.7.f. [10 CFR 72.75(d)(1)(i)]
- b. Within 24 hours after discovery of a significant FFD violation or programmatic failure, or drug and alcohol testing errors, the Shift Manager or Station Management Staff member shall report them by telephone to the NRC Operations Center (See Steps 6.1.1 and 6.8.3). [10 CFR 26.719]
  1. The notifier shall document the notification in Section B of Attachment 4, Significant Fitness for Duty Violation or Programmatic Failure/Drug or Alcohol Testing Errors NRC 24 Hour Notification.

2. The notifier shall return the completed original of Attachment 4 to the Fitness for Duty Administrator (Station) for further processing. See Step 6.8.1.
- c. Within 24 hours, the Shift Manager shall notify NRC by telephone, telegraph, or facsimile, of any occurrence of an unusual or important event—causally related to Station operation—that indicates or could result in significant environmental impact. See also Step 6.26.2.b. (**North Anna**) [NAPS EPP 4.1 & 5.4.2]
- d. Within 24 hours after discovery, Licensing (Station) shall notify (see Step 6.3.1.a.) the NRC Regional Office by telephone of failure to notify NRC of planned removal or significant change in the normal operation of equipment that controls the amount of radioactivity in Station effluents (**North Anna**).

[NAPS Unit 1 License, 2.C(3)(b); Unit 2 License, 2.C(3)(a).]

By the first business day after discovery, Licensing (Station) shall confirm the telephone notification by telegram, mailgram, or facsimile to the NRC Regional Office. See also Step 6.23.6.

- e. If any unpermitted, unusual, or extraordinary discharge<sup>1</sup> enters or could be expected to enter State waters, as soon as possible, but not later than 24 hours after discovery, Electric Environmental Services shall notify (see Step 6.3.1.a.) the State Department of Environmental Quality (Water). See also Steps 6.3.4.a.4., 6.3.2.f., and 6.27.3.n. [VPDES Permit]
- f. If an unplanned bypass (i.e., intentional diversion of waste streams) occurs from any portion of a treatment works, as soon as possible, but not later than 24 hours after the bypass occurs, Electric Environmental Services shall notify (see Step 6.3.1.a.) the State Department of Environmental Quality (Water). [VPDES Permit]

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1. Unusual or extraordinary discharge includes, but is not limited to: a) unplanned bypasses, b) upsets, c) spillage of materials resulting directly or indirectly from processing operations or pollutant management activities, d) breakdown of processing or accessory equipment, e) failure of or taking out of service, sewage or industrial waste treatment facilities, auxiliary facilities, or pollutant management activities, or f) flooding or other acts of nature. [VPDES Permit]

#### 6.3.7 **Seventy-two Hour Notifications**

If a Notification of Unusual Event is declared:

- a. The Station Coordinator Emergency Preparedness shall prepare a Summary Report from information in completed Emergency Plan Implementing Procedures, Control Room logs, and interviews with persons involved with the declaration and response, as appropriate. See Attachment 6, Example DEM Summary Report.
- b. The Site Vice President, Director Nuclear Station Safety and Licensing, or Plant Manager (Nuclear) shall approve the report.
- c. Nuclear Emergency Preparedness shall ensure the report is delivered to the State Coordinator of DEM within 72 hours after the declaration. [NAEP 4.4; SEP 4.4]

### 6.4 **Scheduled Reports**

**NOTE:** Table 2, Directory of Periodic Reports—By Report Name, provides an alphabetical summary of the reports included in this subsection.

#### 6.4.1 **Monthly**

- a. Discharge Monitoring Report—See Step 6.27.3.i.
- b. Operation Report Meter Readings—See Step 6.27.4.a. (**North Anna**)
- c. Sewage Treatment Plant Operation—See Step 6.27.4.b. (**Surry**)
- d. Waterworks Operation—See Step 6.27.4.c. (**Surry**)

#### 6.4.2 **Quarterly**

- a. Groundwater Pumpage and Use Report—See Step 6.27.3.k. (**Surry**)
- b. Temperature Monitoring Data—See Step 6.27.3.q. (**North Anna**)
- c. Reactor Oversight Process (ROP) Report—See Subsection 6.30.
- d. Operating Data Report—See Subsection 6.30.

#### 6.4.3 **Annual**

- a. Changes to the Topical Report, Quality Assurance Program without prior NRC approval—See Step 6.10.5.a.
- b. Early Warning System Availability—See Step 6.27.2.c.
- c. Environmental Operating Report—See Step 6.26.3. (**North Anna**)



- d. Facility changes, tests, and experiments—See Steps 6.10.6. and 6.14.3.
- e. Guarantee of deferred premium payment—See Step 6.17.4.
- f. North Anna Hydroelectric Project Emergency Action Plan adequacy review—See Step 6.18.4.c. **(North Anna)**
- g. North Anna Hydroelectric Project Emergency Action Plan test exercise summary and critique—See Step 6.18.5.b. **(North Anna)**
- h. Final Safety Analysis Report Update—See Step 6.10.9.
- i. Reports of Individual Monitoring—See Step 6.6.7.
- j. Personnel monitoring reports—See Step 6.6.7 **(North Anna)**.
- k. Primary coolant activity level exceeding technical specification limits—See Step 6.24.6. **(Surry)**
- l. Radiation exposure data to individuals—See Step 6.5.2.
- m. Radiological Effluent Release Report—See Step 6.10.3.
- n. Radiological Environmental Operating reports—See Step 6.23.9 **(North Anna)**.
- o. Property damage insurance or financial security—See Step 6.10.5.d.
- p. Shift Manager Responsibility Directive—See Step 6.29.7.
- q. Water Withdrawals—See Step 6.27.3.r.
- r. Tier II information forms—See Step 6.20.10.b.
- s. Financial report —See Steps 6.10.8 and 6.14.11.
- t. Emergency Core Cooling System (ECCS) Evaluation Model Changes— See Step 6.10.4.
- u. Decommissioning Fund Status Report— See Step 6.27.1.c.
- v. Material Balance Report—See Step 6.16.2
- w. Voluntary Protection Program Annual Self-Assessment—See Step 6.27.5.b.
- x. Fitness for Duty Program Assessment Report—See Step 6.8.4.

#### 6.4.4 **Other**

- a. Status of simulator performance tests (every four years)—See Step 6.11.2.
- b. Independent consultant report for Lake Anna Dam (every five years)—See Step 6.18.7.

- c. EPA Form 8700-13A for hazardous wastes (every even-numbered year)—See Step 6.20.7.a.
- d. Decommissioning Fund Status Report (biennial)— See Step 6.10.13.
- e. Site Specific Decommissioning Cost Estimate Update (every four years)— See Steps 6.10.13 and 6.27.1.c.
- f. ISFSI Safety Analysis Report Update (every 24 months from the date of the issuance of the license)—See Step 6.14.5.

- g. Steam Generator Tube Inspection Report (180 days after initial entry into Mode 4 following completion of an inspection per Technical Specification 5.5.9) - See Step 6.23.7.b. (**North Anna**)

Report Name	Addressed At
Decommissioning Reporting and Record Keeping. . . . .	6.10.13 & 6.27.1.c.
Discharge Monitoring . . . . .	6.27.3.i.
EAP Test Exercise Summary and Critique ( <b>North Anna</b> ). . . . .	6.18.5.b.
ECCS Evaluation Model Changes . . . . .	6.10.4
Effluent Releases ( <b>ISFSI</b> ) . . . . .	6.10.3.a.
Early Warning System Availability . . . . .	6.27.2.c.
Environmental Operating ( <b>North Anna</b> ). . . . .	6.26.3
EPA Form 8700-13A for hazardous wastes . . . . .	6.20.7.a.
Final Safety Analysis Report Update. . . . .	6.10.9
Fracture Toughness of Reactor Coolant Pressure Boundary. . . . .	6.10.14
Groundwater Pumpage and Use ( <b>Surry</b> ). . . . .	6.27.3.k.
Guarantee of Deferred Premium Payment . . . . .	6.17.4
Independent Consultant Report (Lake Anna Dam) . . . . .	6.18.7
ISFSI Safety Analysis Report Update . . . . .	6.14.5
Material Status and Physical Inventory Listing . . . . .	6.16.2
Nuclear Liability Financial Protection, Proof of . . . . .	6.17.2
Operation Report Meter Readings ( <b>North Anna</b> ) . . . . .	6.27.4
Personnel Exposure and Monitoring . . . . .	6.6.7
Primary Coolant Activity Exceeds Limits ( <b>Surry</b> ) . . . . .	6.24.6.
Property Insurance, Present Levels and Sources of . . . . .	6.10.5.d.
QA Topical Report Changes . . . . .	6.10.5.a.
Radiation Exposure to Individuals . . . . .	6.5.2
Radiological Effluent Release . . . . .	6.10.3
Radiological Environmental Operating ( <b>North Anna</b> ) . . . . .	6.23.9
Sewage Treatment Plant Operation ( <b>Surry</b> ) . . . . .	6.27.4.b.
Shift Supervisor Responsibility Directive ( <b>North Anna</b> ) . . . . .	6.29.7
Steam Generator Tube Inspection Reports . . . . .	6.23.7 & 6.24.14
Temperature Monitoring Data ( <b>North Anna</b> ) . . . . .	6.27.3.q.
Tier II information forms. . . . .	6.20.10.b.
Water Withdrawals . . . . .	6.27.3.r.
Waterworks Operation ( <b>Surry</b> ) . . . . .	6.27.4.c.

**Table 2**  
**Directory of Periodic Reports—By Report Name**

**6.5 10 CFR 19, Notices, Instructions, and Reports to Workers; Inspections****6.5.1 10 CFR 19.11—Posting of Notices to Workers**

- a. Licensing (Station) shall post a notice that describes the following documents and states where current copies may be examined:
- 10 CFR 19
  - 10 CFR 20
  - The license, license conditions, or documents incorporated into a license by reference, including amendments
  - Plant procedures applicable to licensed activities

**NOTE:** Steps 6.5.1.b. and 6.5.1.c. provides the notice to employees required by 10 CFR 30, 40, 50, 70.7(e), 72.10(e)(1), and 150.

- b. Licensing (Station) shall post Form NRC-3, “Notice to Employees,” at the Station.
- c. Nuclear Licensing and Operations Support shall post Form NRC-3, “Notice to Employees,” on the NL&OS bulletin board.
- d. The postings required by Steps 6.5.1.a. and 6.5.1.b. shall be at these locations:

**North Anna**

- HP dosimetry issue hallway
- Materials building entrance
- Processing Center (TSB) entrance
- Secondary security access control building (when activated)
- Security building hallway
- Training building hallway

**Surry**

- Administration building
- Clean change room
- Machine shop bulletin board
- Radwaste facility
- Secondary access area
- Service building hallway bulletin board

- e. Within one business day after receipt or dispatch, Nuclear Licensing and Operations Support shall provide Licensing (Station) a copy of NRC:
  - Notices of Violation
  - Proposed impositions of civil penalty
  - Orders for imposing requirements
  - Orders modifying, suspending, revoking a license
  - Orders imposing a civil penalty, and responses thereto
- f. Upon receipt of documents that involve radiological working conditions identified in Step 6.5.1.e. above, Licensing (Station) shall post copies at the following locations within two business days after receipt from or dispatch to NRC and shall remain for five business days or until action to correct the violation is completed, whichever is later.
  - HP dosimetry issue hallway (**North Anna**)
  - Secondary security access control building (when activated) (**North Anna**)
  - Security building hallway (**North Anna**)
  - The same locations specified for Surry at Step 6.5.1.d. (**Surry**)
- g. NRC Documents identified in Step 6.5.1.e. above that do not involve radiological working conditions may be referenced in a memorandum posted in the locations identified in Step 6.5.1.f.
- h. Licensing (Station) shall document item postings and removal.
- i. Licensing (Station) shall replace posted items that are defaced or altered.

**6.5.2 10 CFR 19.13(b)—Radiation Exposure Data to Individuals**

Annually, Radiological Protection shall inform each worker of their exposure to radiation or radioactive material as shown in records maintained by Radiological Protection.

**6.5.3 10 CFR 19.13(c)—Radiation Exposure Data to Former Employees/Workers**

At the request of an individual formerly engaged in licensed activities controlled by the Station, Radiological Protection shall provide the individual a report of their exposure to radiation or radioactive material.

- a. The report shall be provided within 30 days after the request or within 30 days after the Station determines the individual's exposure, whichever is later.
- b. The report shall cover the period during which the individual's activities involved exposure to radiation or radioactive materials licensed by NRC.
- c. The report shall include the dates and locations of the individual's participation in licensed activities during the period.

**6.5.4 10 CFR 19.13(d)—Radiation Exposure Data for Overexposures**

If an individual's exposure data is sent to NRC to comply with 10 CFR 20.2202, 20.2203, 20.2204, or 20.2206 (see Step 6.6.4), Radiological Protection shall provide the same exposure data to the employee or worker, in writing, no later than its transmittal to NRC.

**6.5.5 10 CFR 19.13(e)—Radiation Exposure Data to Terminating Individuals**

- a. At the request of a terminating worker, Radiological Protection shall provide the worker or worker's designee a report of the radiation dose received by that worker in connection with Dominion operations during the current calendar year or fraction thereof.
- b. If actual dose has not been determined, Radiological Protection shall provide a written dose estimate. Dose estimates shall be clearly identified as estimates.

**6.6 10 CFR 20, Standards for Protection Against Radiation****6.6.1 10 CFR 20.1906, Procedures for Receiving and Opening Packages****a. Removable Radioactive Surface Contamination**

See Step 6.3.2.b.

**b. External Radiation Levels**

See Step 6.3.2.b.

**6.6.2 10 CFR 20.2201, Reports of Theft or Loss of Licensed Material****a. Immediate Notification**

See Step 6.3.2.a.3.

**b. Thirty-day Notification**

Within 30 days after it becomes known that there is any lost, stolen, or missing licensed material—if licensed material in a quantity greater than 10 times the quantity specified in 10 CFR 20.1001-20.2401, Appendix C, is still missing—the Shift Manager shall notify the NRC Operations Center by telephone.

[10 CFR 20.2201(a)(ii)]

**c. Thirty-day Report**

If a telephone notification is made in accordance with Step 6.3.2.a.3. or Step 6.6.2.b., within 30 days after the telephone notification, a report shall be submitted by an LER, as specified in Step 6.10.11.c. The report shall include:

[10 CFR 20.2201(b)]

- A description of the licensed material involved, including kind, quantity, and chemical and physical form
- A description of the circumstances under which the loss or theft occurred
- A statement of disposition or probable disposition of the licensed material involved
- Radiation exposures to individuals, circumstances under which the exposures occurred, and the possible total effective dose equivalent to persons in unrestricted areas
- Actions that have been taken, or will be taken, to recover the material
- Procedures or measures that have been or will be adopted to prevent a recurrence of the loss or theft of licensed material

**d. Supplemental Reports**

Within 30 days, a supplemental report shall be submitted, by an LER, if any substantial, new information becomes known. [10 CFR 20.2201(d)]

**e. Personal Identity Information**

The names of individuals who may have received radiation exposure shall be stated in a separate and detachable part of reports. [10 CFR 20.2201(e)]

**6.6.3 10 CFR 20.2202, Notifications of Incidents****a. Immediate Notification**

See Step 6.3.2.a.4.

**b. Twenty-four Hour Notification**

See Step 6.3.6.a.1.

**c. Thirty-day Reports**

1. Reports of events that require notifications in accordance with Step 6.6.3.a. or Step 6.6.3.b. shall be submitted to NRC as specified in Step 6.6.4.
2. The names of individuals who have received radiation exposure shall be stated in a separate and detachable part of reports submitted to NRC. [10 CFR 20.2202(c)]

**6.6.4 10 CFR 20.2203, Reports of Overexposures, Radiation Levels, and Concentrations of Radioactive Material Exceeding the Limits**

- a. Within 30 days, a report shall be submitted by an LER, as specified in Step 6.10.11.c., for [10 CFR 20.2203(a) and 10 CFR 20.2203(c)]:
  1. Any incident for which Step 6.6.3 requires NRC notification.
  2. Doses in excess of any of the following (see VPAP-2101, Radiation Protection Program):
    - The occupational dose limits for adults in 10 CFR 20.1201
    - The occupational dose limits for a minor in 10 CFR 20.1207
    - The limits for an embryo/fetus of a declared pregnant woman in 10 CFR 20.1208
    - The limits for an individual member of the public in 10 CFR 20.1301
    - Any applicable limit in the license
    - Any ALARA constraints for air emissions established under 10 CFR 20.1101(d)
  3. Levels of radiation or concentrations of radioactive material in:
    - A restricted area in excess of any applicable limit in the license
    - An unrestricted area in excess of 10 times any applicable 10 CFR 20 or license limit (whether or not involving exposure of any individual that exceeds 10 CFR 20.1301 limits)



**NOTE:** Reports submitted to NRC in accordance with Step 6.10.11.b.10. or Step 6.10.11.b.11. fulfill the effluent release reporting requirements of Step 6.6.4.a.4. [10 CFR 20.2203(c)]

4. Levels of radiation or releases of radioactive material that exceed 40 CFR 190 limits, or license conditions related to 40 CFR 190 limits. [10 CFR 20.2203(a)(4)]
- b. Each report required by 10 CFR 20.2203(a) shall describe the extent of exposure of individuals to radiation or radioactive materials, including [10 CFR 20.2203(b)]:
  - Estimates of each individual's dose
  - Levels of radiation and concentrations of radioactive material involved
  - The cause of the elevated exposures, dose rates, or concentrations
  - Corrective steps taken or planned to prevent a recurrence, including the schedule for achieving conformance with applicable limits, generally applicable environmental standards, and associated license conditions
- c. For each individual exposed, the report shall include, in a separate and detachable part, the individual's name, Social Security number, date of birth, and an estimate of the individual's exposure. [10 CFR 20.2203(b)(2)]
- d. If an event involves radiological overexposure or exposure to radioactive materials, see Step 6.5.4.
- e. If an event involves radiological exposure and the DEM has not already been notified, see Step 6.27.2.

**6.6.5 10 CFR 20.2204, Reports of Planned Special Exposures**

If a planned special exposure is conducted in accordance with VPAP-2101, Radiation Protection Program:

- a. Radiological Protection shall prepare a report to inform NRC that a planned special exposure was conducted in accordance with 10 CFR 20.1206, and indicating the date the planned special exposure occurred and:
  - A description of the exceptional circumstances that required use of a planned special exposure
  - The name of the member of management who authorized the planned special exposure and a copy of the signed authorization
  - What actions were necessary
  - Why the actions were necessary
  - How doses were maintained ALARA
  - What individual and collective doses were expected, and what doses were actually received in the planned special exposure
- b. Nuclear Licensing and Operations Support shall review the report.
- c. The Senior Vice President Nuclear Operations shall approve the report.
- d. Within 30 days after the planned special exposure is conducted, Nuclear Licensing and Operations Support shall submit the report to the NRC Regional Office.

**6.6.6 10 CFR 20.2205, Reports to Individuals of Exceeding Dose Limits**

- a. Copies of reports to the NRC, pursuant to the provisions of 10CFR20.2203, 20.2204, or 20.2206, of any exposure of identified occupationally exposed individual(s), or identified member(s) of the public to radiation or radioactive material, shall be provided to the individual(s).
- b. The reports shall be transmitted to the individual(s) at a time no later than the transmittal to the NRC.

**6.6.7 10 CFR 20.2206, Reports of Individual Monitoring**

**NOTE:** This report can be submitted in conjunction with the Primary Coolant Activity Level Exceeding T.S. Limits Report—See Step 6.24.6 (**Surry**)

- a. Radiological Protection shall prepare a calendar year report of the results of individual monitoring performed for each individual for whom monitoring was required in accordance with 10 CFR 20.1502. The report may include data for individuals for whom monitoring was provided, but not required.
- b. The report shall be prepared on Form NRC 5 or electronically, including all the information required by Form 5.
- c. Licensing (Station) shall review the report.
- d. The Director Nuclear Station Safety and Licensing shall approve the report.
- e. By the end of April, Licensing (Station) shall submit the report for the preceding year to the REIRS Project Manager, Office of Nuclear Regulatory Research.

**6.6.8 10 CFR 20.2207, Reports of Transactions Involving Nationally Tracked Sources**

**NOTE:** Each licensee is required to reconcile its on-site inventory of nationally tracked sources with the information previously reported to the National Source Tracking System. Each licensee must compare the information contained in the system to its own inventory, including a check of the model and serial number of each source. This reconciliation does not require the licensee to conduct an additional physical inventory of its sources.

- a. Radiological Protection shall perform annual reconciliation in January.
- b. Licensing (Station) shall review the report.
- c. The Manager Radiological Protection shall approve the report.
- d. Reconciliation reporting can be performed electronically or in hard copy form.
- e. By January 31 of each year, Radiological Protection shall submit to the National Source Tracking System confirmation that the data in the National Source Tracking System is correct.

**6.7 10 CFR 21, Reporting of Defects and Noncompliance****6.7.1 10 CFR 21.6, Posting requirements**

- a. Licensing (Station) and Nuclear Licensing and Operations Support, respectively, shall post current copies of these documents at the Station and at Innsbrook:
- The regulations in 10 CFR 21
  - Section 206 of the Energy Reorganization Act of 1974
  - Procedures that implement the requirements of 10 CFR 21

**NOTE:** A notice—posted in lieu of the specified documents—with content similar to that described in LI-AA-301, Implementation of 10 CFR 21, Reporting of Defects and Noncompliance, will fulfill the requirements of Step 6.7.1.a.

- b. Notices shall be posted at these locations:

**Innsbrook Technical Center**

- Nuclear Licensing and Operations Support bulletin board

**North Anna**

- HP dosimetry issue hallway
- Materials building entrance
- Processing Center (TSB) entrance
- Secondary security access control building (when activated)
- Security building hallway
- Training building hallway

**Surry**

- Administration Building
- Clean Change Room wall
- Machine Shop bulletin board
- Radwaste facility
- Secondary Access Area
- Service Building hallway bulletin board

**6.7.2 10 CFR 21.21, Notification of Failure to Comply or Existence of a Defect**

LI-AA-301, Implementation of 10 CFR 21 Reporting of Defects and Noncompliance, provides the method by which potential defects or failures to comply (noncompliance) associated with a basic component are evaluated in order to identify a defect that could create a substantial safety hazard as specified in 10 CFR 21, were it to remain uncorrected, and to identify the reporting and record keeping requirements associated with said evaluations.

**6.8 10 CFR 26, Fitness for Duty Programs****6.8.1 Significant Events**

- a. If the Corporate Fitness for Duty Administrator becomes aware of a significant fitness for duty event that involves corporate personnel subject to 10 CFR 26, the Administrator shall determine at which stations the individual has unescorted access. Immediately, the Corporate Fitness for Duty Administrator shall notify either or both Station Fitness for Duty Administrators who shall coordinate a single notification.
- b. If a Station Fitness for Duty Administrator becomes aware of a significant fitness for duty event that involves personnel with unescorted access to the Station, they shall:
  1. Immediately prepare Section A of Attachment 4, Significant Fitness for Duty Violation or Programmatic Failure/Drug or Alcohol Testing Errors NRC 24 Hour Notification.
  2. Immediately, submit the form to the Site Vice President or a Director.
- c. See Step 6.3.6.b.
- d. Promptly after Attachment 4 is returned by the notifier, the Station Fitness for Duty Administrator shall send a copy of Attachment 4 to the Fitness for Duty Program Manager, the Site Vice President, and the Director NL&OS.

**6.8.2 NRC Employee Potentially Unfit for Duty**

See Step 6.3.2.c.

**6.8.3 Drug and Alcohol Testing Errors**

- a. Within 30 days of completing an investigation of any testing errors or unsatisfactory performance discovered in performance testing at either a Dominion testing facility or an HHS-certified laboratory, in the testing of quality control or actual specimens, or through the processing of FFD policy violation and MRO reviews, as well as any other errors or matters that could adversely reflect on the integrity of the random selection or testing process, a report of the incident and the corrective actions taken or planned shall be submitted to the NRC. [10 CFR 26.719(c)(1)]
- b. The FFD Administrator (Corporate) shall prepare a report that describes the testing errors or unsatisfactory performance.
- c. The Fitness for Duty Program Manager shall review the report and forward it to the Senior Vice President Nuclear.
- d. The Senior Vice President shall submit the report to the NRC Regional Office.
- e. Within 24 hours after discovery of a false positive error on a blind performance test sample submitted to an HHS certified laboratory, notification shall be made to Station Management by the Fitness for Duty Administrator (Corporate). The Shift Operations Manager or a Station Management Staff member shall report the error to the NRC Operations Center in accordance with Step 6.3.6.b. [10 CFR 26.719(c)(2)]
- f. Within 24 hours after discovery of a false negative on a quality assurance check of validity screening tests, notification shall be made to Station Management by the Fitness for Duty Administrator (Corporate) The Shift Operations Manager or a Station Management Staff member shall report the error to the NRC Operations Center in accordance with Step 6.3.6.b. [10 CFR 26.719(c)(3)]
- g. Non reportable indicators of FFD programmatic weaknesses shall be documented in the Corrective Action Program, trended and corrected.

**6.8.4 FFD Program Annual Performance Data Report**

- a. As soon as possible after December 31, the FFD Program Annual Performance Data Report for January through December shall be submitted to the NRC annually before March 1 of the following year. The report shall contain the following information: [10 CFR 26.717]
  - The FFD program performance data must include:
    - Random testing rate
    - Drugs tested with cutoff levels
    - Populations tested with results sorted by population
    - Test conditions
    - Substances identified
    - Number of subversion attempts
    - Summary of management actions
    - Number of work hour Waivers issued with summary of distribution per individual within each category
    - Summary of corrective actions resulting from the analyses of the Waiver data, including fatigue assessments
  - Summary of management actions implement to correct identified program weaknesses
  - Number of terminations and administrative actions taken against individuals
  - Test results of positive initial drug tests by processing stage (e.g., initial test, testing at lab, MRO determination)
- b. The Fitness for Duty Manager shall review the report.
- c. The Director NL&OS shall submit the report to the NRC Regional Office before March 1 of the following year.

**6.9 10 CFR 31, General Domestic Licenses for Byproduct Material [Commitment 3.2.23]**

10 CFR 31.5 covers certain detecting, measuring, gauging or controlling devices and certain devices for producing light or an ionized atmosphere. Examples include self-luminous exit signs, smoke detectors, metal analyzers, dew point meters, and fluorotracers.

6.9.1 A report shall be submitted to the NRC within 30 days, or as specified in any request, in accordance with 31.5 in the event of:

- Theft, loss, damage, or indication of possible failure or damage,
- Transfer or disposal of device,
- Detection of removable contamination in excess of specified limits,
- Request from the NRC for annual registration,
- Request from the NRC for additional information, or
- Change of address of device location.

6.9.2 Radiation incidents, loss, or theft shall be reported in accordance with 10 CFR 20.2201 and 2202.

**6.10 10 CFR 50, Domestic Licensing of Production and Utilization Facilities****6.10.1 10 CFR 50.9, Completeness and Accuracy of Information**

Any information identified as having a significant implication for public health and safety or common defense and security, not already required to be provided to NRC by other reporting or updating requirements, shall be reported to the NRC Regional Office within two business days after the information is identified. See also Step 6.29.6.

**6.10.2 10 CFR 50.36, Technical Specifications**

- a. Shutdown because a safety limit is exceeded—see Steps 6.3.2.a.5., 6.23.3 and 6.24.3 [10 CFR 50.36(d)(1)(i)(A) & (d)(7)]

**NOTE:** Specific Safety Limit Violation report requirements are included at Step 6.23.3. (North Anna)

- b. Automatic safety system—see Steps 6.3.3.b. and 6.10.2.a.

[10 CFR 50.36(d)(1)(ii)(A) & (d)(7)]

- c. Shutdown due to an LCO—see Steps 6.3.4.1. and 6.10.2.a. [10 CFR 50.36(d)(2) & (d)(7)]



**6.10.3 10 CFR 50.36a, Technical Specifications on Effluents**

- a. Radiological Protection shall prepare an annual Radiological Effluent Release report covering the operation of the unit in the previous year that demonstrates compliance with requirements as specified in VPAP-2103N, Offsite Dose Calculation Manual (North Anna), VPAP-2103S, Offsite Dose Calculation Manual (Surry) , and VPAP-2104, Radioactive Waste Process Control Program (PCP). The material shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV. B. 1. [NAPS TS 5.6.3; SPS TS 6.6.B.3] The report shall:
- Summarize on a quarterly basis, in the format of Regulatory Guide 1.21, Appendix B<sup>1</sup>, the quantities of radioactive liquid and gaseous effluents released from each unit<sup>2</sup> [NAPS TS 5.6.3; SPS TS 6.6.B.3]
  - Summarize on an annual basis, in the format of Regulatory Guide 1.21, Appendix B<sup>1</sup>, the quantity of solid waste released from each unit<sup>2</sup>[NAPS TS 5.6.3; SPS TS 6.6.B.3]
  - State the quantity of each principal radionuclide released to unrestricted areas in liquid and gaseous effluents (including the ISFSI) [10 CFR 72.44(d)(3), SPS ISFSI TS App. C, 1.4.1, and NAPS ISFSI TS 5.5.2]
  - Discuss releases for which a report was required by Step 6.10.16
  - Provide an assessment<sup>3</sup> of radiation dose to the maximum exposed members of the public due to radioactive liquid and gaseous effluents during the previous calendar year.
  - List unplanned releases of liquid or gaseous radioactive material, from the site to unrestricted areas, that exceeded the effluent dose rate limitations as specified in VPAP-2103
  - Provide any supplemental information NRC may need to estimate maximum potential annual radiation doses to the public from effluents
  - Explain any failures to correct inoperable radioactive gaseous effluent monitoring instrumentation within the limits specified in VPAP-2103

(continued)

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1. Where the Regulatory Guide refers to Technical Specification limits, use the values in VPAP-2103.  
2. A single submittal may be made for both units; material common to both units shall be combined. For units with separate radwaste systems the submittal shall specify the releases of radioactive material from each unit.  
3. The assessment method shall be as specified in VPAP-2103.

## Step 6.10.3.a (continued)

- If samples were unavailable for the Radiological Environmental Monitoring Program, as specified in VPAP-2103, identify the cause of the unavailability of samples and identify the new locations for obtaining replacement samples. If not implemented during the reporting period in a revision to VPAP-2103, provide a copy of the figures and tables that reflect the new locations
- If new land use census locations are added to comply with VPAP-2103, identify the new locations and, if not reflected in an enclosed submittal of VPAP-2103, provide a copy of the figures and tables that reflect the new locations
- Describe any major changes to radioactive liquid, gaseous, or solid waste treatment systems, initiated by Dominion and reviewed by FSRC during the reporting period. Include<sup>1</sup>:
  - A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59
  - Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information
  - A detailed description of the equipment, components, and processes involved, and interfaces with other Station systems (continued)
  - An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents or in solid waste quantity that differs from those previously predicted in the license
  - An evaluation of the change which shows the expected maximum exposures to an individual in the unrestricted area that differ from those previously estimated in the license application and amendments thereto
  - A comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to the changes
  - An estimate of plant operating personnel exposure due to the change
  - Documentation of FSRC review and acceptance
- Include a copy of VPAP-2103 if revised during the reporting period (as specified in Step 6.23.12)

b. Licensing (Station) shall review the report.

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1. Alternatively, this information may be provided in the UFSAR.

- c. The Director Nuclear Station Safety and Licensing shall approve the report.
- d. By May 1 (March 1-Surry ISFSI and May 1-North Anna ISFSI), Licensing (Station) shall submit the report for the previous year to NRC, to the NRC Regional Office, and for the ISFSI, to the NRC Director, Office of Nuclear Material Safety and Safeguards. [SPS ISFSI TS App. C, 1.4.1 & NAPS ISFSI TS 5.5.2]

6.10.4 **10 CFR 50.46, Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors**

- a. Nuclear Analysis and Fuel shall prepare a Report of Emergency Core Cooling System (ECCS) Evaluation Changes Pursuant to the Requirements of 10 CFR 50.46 for each calendar year. For each change or error discovered in an acceptable evaluation model that affects the peak clad temperature calculation, the report shall document the nature of the change or error and its estimated effect on the limiting ECCS analysis. [10 CFR 50.46(a)(3)(ii)]

Note that if the change or error is significant, this shall be reported within 30 days and include a proposed schedule for providing a reanalysis or taking other action as may be needed to show compliance with the 50.46 requirements. A significant change or error is one that results in a calculated peak fuel cladding temperature different by more than 50 degrees F from the temperature calculated for the limiting transient using the last acceptable model or is a culmination of changes and errors such that the sum of the absolute magnitudes of the respective temperature changes is greater than 50 degrees F. [10 CFR 50.46(a)(3)(ii)]

- b. The Site Vice President shall review the report.
- c. The Director NL&OS shall approve the submittal.
- d. By June 30, Nuclear Licensing and Operations Support shall submit the report for the previous year to the NRC.

**6.10.5 10 CFR 50.54, Conditions of Licenses**

- a. If the quality assurance program description in the UFSAR requires prior NRC approval, Nuclear Licensing and Operations Support shall prepare a submittal that includes all pages affected by that change and a forwarding letter. [10 CFR 50.54(a)(4)]
  1. The forwarding letter shall identify the change, the reason for the change, and the basis for concluding that the revised program incorporating the change continues to satisfy 10 CFR 50, Appendix B and associated commitments accepted by NRC.
  2. The forwarding letter is not required to provide the basis for changes that correct spelling, punctuation or editorial items.
  3. FSRC, the Site Vice President, Nuclear Oversight, and Nuclear Licensing and Operations Support shall review the submittal.
  4. The Senior Vice President Nuclear Operations shall approve the submittal.
- b. If the Security Plan is revised without prior NRC approval, as permitted by 10 CFR 50.54(p)(1):
  1. Security shall prepare a report that describes the change(s). See also Step 6.14.12.
  2. The Director Nuclear Security and Emergency Preparedness shall review and approve the report.
  3. The Senior Vice President Nuclear shall approve the submittal.
  4. Within two months after the change is implemented, Nuclear Licensing and Operations Support shall submit the report to NRC. [10 CFR 50.54(p)(2)]
- c. If the Emergency Plan is revised without prior NRC approval, as permitted by 10 CFR 50.54(q) or (ISFSI) 10 CFR 72.44(f):
  1. The Director Nuclear Protection Services and Emergency Preparedness shall initiate submittal of the revised Plan.
  2. Within 30 days following the assigned effective date, Nuclear Licensing and Operations Support shall submit the revised Plan to NRC and to the NRC Director, Spent Fuel Project Office, Office of Nuclear Material Safety and Safeguards. [10 CFR 50.54(q) & 10 CFR 72.44(f)]

- d. Each year, Corporate Risk Management shall prepare a report of the current levels of Station property damage insurance or financial security that Dominion maintains and the sources of this insurance or financial security.
1. Nuclear Licensing and Operations Support shall review the report.
  2. The Director NL&OS shall approve the report.
  3. By April 1, Nuclear Licensing and Operations Support shall send the report for the preceding year to NRC. [10 CFR 50.54(w)(3)]
- e. If action is taken as permitted by 10 CFR 50.54(x), see Step 6.3.3.a.
- f. Not later than five years before the reactor operating license expires, Nuclear Licensing and Operations Support shall prepare and submit to NRC for review and approval a report that describes the program for managing and funding management for irradiated fuel after the license expires, until title is passed to the Secretary of Energy. [10 CFR 50.54(bb)]
- g. If a voluntary or involuntary petition is filed under any chapter of Title 11 of the United States Code by or against: [10 CFR 50.54(cc) & 10 CFR 72.44(b)(6)(i)]
- Dominion
  - Dominion Resources
  - An affiliate of Dominion

Nuclear Licensing and Operations Support shall prepare and submit a report to the NRC Regional Administrator immediately following the filing. The report shall indicate:

- The bankruptcy court in which the petition was filed
- The date the petition was filed

#### 6.10.6 **10 CFR 50.59, Changes, Tests, and Experiments**

- a. For each calendar year, Licensing (Station) shall prepare a report to NRC that contains a brief description of changes, tests, and experiments for which Regulatory Evaluations were prepared, and a summary of each Regulatory Evaluation.
- b. The Director Nuclear Station Safety and Licensing shall approve the report.
- c. By March 31 of the following year, Licensing (Station) shall submit the report to NRC.

**6.10.7 10 CFR 50.61, Fracture Toughness Requirements for PTS Protection**

Whenever changes in core loadings, surveillance measurements, or other information indicate a significant change in projected values of  $RT_{PTS}$  (see also Step 6.10.14):

- a. NAF shall prepare a revised assessment to reflect the changes.
- b. Nuclear Licensing and Operations Support shall review the revised assessment.
- c. FSRC shall approve the revised assessment.
- d. Nuclear Licensing and Operations Support shall submit the revised assessment to NRC.

**6.10.8 10 CFR 50.71(b), Financial Report**

- a. Upon issuance of each Dominion Annual Report (including certified financial statements), Accounting Research and Control shall immediately send a copy to the Senior Vice President Nuclear Operations.
- b. Nuclear Licensing and Operations Support shall submit the report to NRC and to the NRC Office of Nuclear Material Safety and Safeguards. [10 CFR 50.71(b) & 10 CFR 72.80(b)]

**6.10.9 10 CFR 50.71(e), Final Safety Analysis Report Updating**

- a. Annually or 6 months after each refueling outage, provided the interval between successive updates does not exceed 24 months, Nuclear Engineering (ISI/DBD/UFSAR) shall prepare a report to the NRC that includes Updated Final Safety Analysis Report pages that have been updated as delineated in 10 CFR 50.71(e).
- b. An NBU Officer of the Company, as designated in LI-AA-200, NRC Licensing Correspondence, shall approve the submittal.
- c. By October 15 of every year, NL&OS shall submit the report to the NRC.

**6.10.10 10 CFR 50.72, Immediate Notification Requirements**

See Subsection 6.3.

**6.10.11 10 CFR 50.73, Licensee Event Report System**

**NOTE:** Attachment 5, 10 CFR 50.73 Reportability Guidelines, provides examples and more detailed guidance for interpreting the requirements of parts of this Step.

- a. Specified events shall be reported with an LER regardless of the plant mode or power level, and regardless of the significance of the structure, system, or component that initiated the event.
- b. Dominion shall report:
  1. Completion of any plant shutdown required by the Technical Specifications [10 CFR 50.73(a)(2)(i)(A)].
  2. Initiation of plant shutdown (reduction of power or temperature) required by Technical Specifications because a safety limit is exceeded, an automatic safety system does not function as required, or a limiting condition for operation is not met. [10 CFR 50.36(d)(1)(i)(A), (d)(1)(ii)(A), (d)(2) & (d)(7)]
  3. An operation or condition prohibited by Technical Specifications except when [10 CFR 50.73(a)(2)(i)(B)]:
    - The Technical Specification is administrative in nature;
    - The event consisted solely of a case of a late surveillance test where the oversight was corrected, the test was performed, and the equipment was found to be capable of performing its specified safety functions; or
    - The Technical Specification was revised prior to discovery of the event such that the operation or condition was no longer prohibited at the time of discovery of the event
  4. A deviation from the Technical Specifications authorized by 10 CFR 50.54(x). [10 CFR 50.73(a)(2)(i)(C)]
  5. Any event or condition that resulted in the condition of the plant, including its principal safety barriers, being seriously degraded, or that resulted in the plant being in an unanalyzed condition that significantly degraded plant safety. [10 CFR 50.73(a)(2)(ii)]

6. A natural phenomenon or other external condition that posed an actual threat to the safety of the Station or significantly hampered Station personnel in the performance of duties necessary for the safe operation of the Station.

[10 CFR 50.73(a)(2)(iii)]

7. Any event or condition that resulted in manual or automatic actuation of any of the following systems, except when:

- The actuation resulted from and was part of a preplanned sequence during testing or reactor operation

**or**

- The actuation was invalid (see Subsection 4.2) **and**:

- Occurred while the system was properly removed from service

**or**

- Occurred after the safety function had already been completed

[10 CFR 50.73(a)(2)(iv)(A)]

- Reactor Protection System (RPS)
- General containment isolation signals affecting containment isolation valves in more than one system or multiple Main Steam Isolation Valves (MSIVs)
- Emergency core cooling systems (ECCS) including: HHSI and LHSI systems.
- Auxiliary feedwater system.
- Containment heat removal and depressurization systems, including containment spray and fan cooler systems.
- Emergency Diesel Generators (EDGs)



**NOTE:** Events in Step 6.10.11.b.8. may include one or more procedural errors, equipment failures, and/or discovery of design, analysis, fabrication, construction, and/or procedural inadequacies. However, individual component failures need not be reported pursuant to this paragraph if redundant equipment in the same system was operable and available to perform the required safety function.

8. An event or condition that could have prevented fulfillment of the safety function of structures or systems needed to [10 CFR 50.73(a)(2)(v) and (vi)]:

- Shut down the reactor and maintain it in a safe shutdown condition
- Remove residual heat
- Control the release of radioactive material, or
- Mitigate the consequences of an accident

9. An event where a single cause or condition caused at least one independent train or channel to become inoperable in multiple systems or two independent trains or channels to become inoperable in a single system designed to

[10 CFR 50.73(a)(2)(vii)]:

- Shut down the reactor and maintain it in a safe shutdown condition, or
- Remove residual heat, or
- Control the release of radioactive material, or
- Mitigate the consequences of an accident

**NOTE:** LERs submitted in accordance with Step 6.10.11.b.10. or Step 6.10.11.b.11. also fulfill the effluent release reporting requirements of Step 6.6.4.a.4., subject to the content requirements of Step 6.6.4.b.

10. An airborne radioactivity release that, when averaged over a period of one hour, resulted in airborne radionuclide concentrations in an unrestricted area that exceeded 20 times the applicable concentration of the limits specified in 10 CFR 20.1001-20.2401, Appendix B, Table 2, Column 1.

[10 CFR 50.73(a)(2)(viii)(A)]

11. A liquid effluent release that, when averaged over a period of one hour, exceeded 20 times the applicable concentrations specified in 10 CFR 20.1001-20.2401, Appendix B, Table 2, Column 2, at the point of entry into the receiving waters (i.e., unrestricted area), for all radionuclides except tritium and dissolved noble gases. [10 CFR 50.73(a)(2)(viii)(B)]

**NOTE:** Events in Step 6.10.11.b.12. may include cases of procedural error, equipment failure, and/or discovery of a design, analysis, fabrication, construction, and/or procedural inadequacy. However, component failures need not be reported if the event results from a shared dependency among trains or channels that is a natural or expected consequence of the approved plant design; or normal and expected wear or degradation.

12. Any event or condition that as a result of a single cause could have prevented the fulfillment of a safety function for two or more trains or channels in different systems that are needed to: [10 CFR 50.73(a)(2)(ix)]
    - Shut down the reactor and maintain it in a safe shutdown condition;
    - Remove residual heat;
    - Control the release of radioactive material; or
    - Mitigate the consequences of an accident
  13. An event that posed an actual threat to the safety of the plant or significantly hampered Station personnel in the performance of duties necessary for the safe operation of the Station including: [10 CFR 50.73(a)(2)(x)]
    - Fires
    - Toxic gas releases
    - Radioactive releases
- c. Within 60 days after the discovery of the event, Licensing (Station) shall prepare, obtain FSRC and Site Vice President approval of, and submit an LER to NRC for any event specified in Step 6.10.11.b.
1. LER preparation shall comply with the requirements of 10 CFR 50.73(b), (c), (d), and (e). [Commitments 3.2.5 and 3.2.6]
  2. If the end of the 60-day period falls on a holiday or weekend, the LER may be mailed on the first business day following the end of the 60 days.

3. If an LER is used to submit a report for an issue with an earlier time limit for reporting, the earlier limit shall apply.
- d. Site Engineering (and other Station and corporate organizations as appropriate) shall support LER preparation as requested by Licensing (Station).
- e. The EPIX Coordinator shall determine whether component failures or malfunctions should be shown as EPIX reportable on an LER. [**Commitment 3.2.3**]
- f. If an LER is submitted pursuant to 10 CFR 20.2203, at the same time the LER is submitted to NRC, Licensing (Station) shall send a copy of the LER to the individual involved.
- g. If it becomes appropriate or necessary to withdraw an LER, Licensing (Station) shall prepare an explanatory letter, in a format similar to that used to submit the LER but without any special LER notations. Review, approval, and submittal for the letter shall be the same as for the LER being withdrawn.

**6.10.12 10 CFR 50.74, Change in Licensed Operator Status**

- a. The Manager Nuclear Training shall prepare a letter of notification for Licensing (Station) if an NRC-licensed operator:
  - Ceases to be employed by Dominion [**Commitment 3.2.11**]
  - Is permanently reassigned from a position for which Dominion has certified the need for such a license [10 CFR 55.31(a)(3)]
  - Develops a physical condition that may permanently and adversely affect performance of assigned licensed duties or may cause operational errors. Notification is not required for temporary disabilities provided the licensee is administratively prevented from performing licensed duties during the period of the licensee's disability. [NUREG 1021, 10 CFR 55.25; 10 CFR 55.33(a)(1)]
  - Develops a physical condition that requires a conditional license [10 CFR 55.23]

- b. The Manager Nuclear Operations with the assistance of the Manager Nuclear Training (if deemed appropriate) shall prepare a letter of notification for Licensing (Station) if an NRC-licensed operator:
- Develops a mental condition that may that may permanently and adversely affect performance of assigned licensed duties or may cause operational errors.
- Notification is not required for temporary disabilities provided the licensee is administratively prevented from performing licensed duties during the period of the licensee's disability. [NUREG 1021, 10 CFR 55.25; 10 CFR 55.33(a)(1)]

**NOTE:** The following confirmed positive chemical test notification may be superseded by a related NRC request for information.

- Has a confirmed positive chemical test as a result of Fitness for Duty testing
  - Is convicted of a felony [10 CFR 55.33] (See also Steps 6.3.4.a.4., 6.8.1, and 6.27.2.a.)
- c. The Site Vice President shall review the letter of notification for Step 6.10.12.a.
- d. The Site Vice President shall review the letter of notification for Step 6.10.12.b.
- e. The Site Vice President shall approve the letter of notification.
- f. Within 30 days after the event, Licensing (Station) shall submit notification to NRC.

#### 6.10.13 **10 CFR 50.75, Reporting and Record Keeping for Decommissioning Planning**

**NOTE:** Additional decommissioning reporting to the State Corporation Commission and FERC are contained in Step 6.27.1.

**NOTE:** Treasury is responsible for establishing and maintaining the Decommissioning Trust Fund and any required change to the certification of financial assurance.

- a. Once every two years a report shall be submitted to the NRC providing a status of the decommissioning fund for each nuclear unit in accordance with 10 CFR 50.75(f)(1). Treasury shall provide NL&OS an annual Decommissioning Trust Fund Status Report, along with a description of any changes to the method of providing financial assurance, in order to develop the status report.
1. The Site Vice President shall review the submittal.

2. The Director NL&OS shall approve the submittal.
  3. By March 31 every other year (odd years), NL&OS shall submit the report to the NRC.
- b. NL&OS shall update the Site Specific Cost Studies every four years to be available as input to the Decommissioning Trust Fund Status Report. The studies may be used by the Company for determining the appropriate level of revenue collection necessary to assure financial ability to decommission the facilities. The decommissioning alternatives considered by Dominion shall be in accordance with those options allowed by 10 CFR 50.82. The report should be produced in accordance with the AIF/NESP “Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates” (**Reference 3.1.93**) and Regulatory Guide 1.159, “Assuring the Availability of Funds for Decommissioning Nuclear Reactors”, dated August 1990 (**Reference 3.1.94**). The report shall contain as a minimum:
1. Cost breakdown between radiological and non-radiological cleanup.
  2. ISFSI related costs.
  3. Major activities need to be broken down (e.g., labor, waste burial, equipment, engineering).
  4. An estimated schedule shall be provided for each evaluated method.
  5. A cost comparison between the most recent recommended method and the current recommended method detailing the differences in cost.
- c. At least five years prior to the projected end of operation, a preliminary decommissioning cost estimate shall be submitted to the NRC in accordance with 10 CFR 50.75(f)(3).
- d. At least two years prior to the projected end of operation, a preliminary decommissioning plan shall be submitted to the NRC in accordance with 10 CFR 50.75(f)(4).
- e. When permanently ceasing operation, reports shall be submitted to the NRC as required per 10 CFR 50.82.

**6.10.14 10 CFR 50, Appendix G, Fracture Toughness Requirements**

At least three years before the predicted date that fracture toughness levels will no longer satisfy the requirements of 10 CFR 50, Appendix G, Section IV.A.1.c. (see also Step 6.10.7):

- a. NAF shall prepare the proposed programs to satisfy the requirements of 10 CFR 50, Appendix G, Sections IV.A.1.a and IV.A.1.b.
- b. FSRC and Nuclear Licensing and Operations Support shall review the proposed programs.
- c. The Senior Vice President Nuclear shall approve the proposed programs.
- d. Nuclear Licensing and Operations Support shall submit the proposed programs to NRC for review and approval. [10 CFR 50, App. G, Section IV]

**6.10.15 10 CFR 50, Appendix H, Reactor Vessel Material Surveillance Program**

After specimens are withdrawn from capsules:

- a. NAF shall coordinate preparation of a summary technical report that includes the data required by ASTM E 185, as specified in 10 CFR 50, App. H, Section III.B.1, and the results of all fracture toughness tests conducted on the surveillance capsule materials in the irradiated and unirradiated conditions.
- b. Within one year after surveillance capsule removal, Nuclear Licensing and Operations Support shall submit the report to NRC. If a Technical Specification change is required, whether pressure-temperature limits or operation procedures required to meet the limits, the expected submittal date for the change shall be included with the report. [10 CFR 50, App. H, Section IV]

**6.10.16 10 CFR 50, Appendix I, Numerical Guides for Effluent ALARA**

- a. If the limits specified in VPAP-2103N, Offsite Dose Calculation Manual (North Anna), VPAP-2103S, Offsite Dose Calculation Manual (Surry) , are exceeded for:
  - The quantity of radioactive material actually released to unrestricted areas during any calendar quarter
  - The calculated air dose from radioactive noble gases in gaseous effluents
  - The calculated dose from the release of I-131, tritium, and radionuclides in particulate form, with half-lives greater than eight days, in gaseous effluents
  - Reporting radioactivity concentrations in environmental samples, when averaged over any calendar quarter
  1. Radiological Protection shall prepare a report that:
    - Identifies the causes for exceeding the specified limits
    - Describes corrective actions taken to reduce releases
    - Describes actions taken or proposed to ensure subsequent releases will not exceed the specified limits
  2. Nuclear Licensing and Operations Support shall review the report.
  3. The Senior Vice President Nuclear Operations shall approve the report.
  4. Within 30 days after the release, Nuclear Licensing and Operations Support shall submit the report to NRC. [10 CFR 50, App. I, Section IV.A.3]
- b. If radioactive liquid or gaseous waste is discharged, without treatment, beyond the limits specified in VPAP-2103N, Offsite Dose Calculation Manual (North Anna), VPAP-2103S, Offsite Dose Calculation Manual (Surry) :
  1. Radiological Protection shall prepare a report that:
    - Explains why radwaste exceeding specified limits was being discharged without treatment
    - Identifies any nonfunctional equipment or sub-system, and the reason for nonfunctionality
    - Describes action taken to restore nonfunctional equipment to functional status
    - Summarizes action to prevent recurrence
  2. FSRC and Licensing (Station) shall review the report.
  3. The Site Vice President shall approve the report.

4. Within 30 days after the end of the quarter, the Site Vice President shall submit the report to NRC.

**6.10.17 10 CFR 50, Appendix J, Primary Reactor Containment Leakage Testing**

- a. A post outage report shall be prepared by Nuclear Engineering presenting the results of the previous cycle's Type B and Type C tests, and Type A, if performed during that outage.
- b. The technical contents of the report will be in accordance with NEI 94-01, Revision 0, dated July 26, 1995, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J", and endorsed by Regulatory Guide 1.163, Performance-Based Containment Leak Test Program dated September 1995.
- c. The report shall also show that the applicable performance criteria are met, and serves as a record that continuing performance is acceptable.
- d. The reports shall be retained for internal and external review.

**6.11 10 CFR 55, Operator's Licenses**

**6.11.1 10 CFR 55.25, Incapacitation Because of Disability or Illness**

See Step 6.10.12.

**6.11.2 10 CFR 55.46, Simulator Certification**

- a. Performance testing shall be conducted throughout the life of the simulation facility in a manner sufficient to ensure that paragraphs 55.46(c)(2)(ii), as applicable, and 55.46(d)(3) are met. The results of performance tests must be retained for four years after the completion of each performance test or until superseded by updated test results;
- b. Correct modeling and hardware discrepancies and discrepancies identified from scenario validation and from performance testing;
- c. Make results of any uncorrected performance test failures that may exist at the time of the operating test or requalification program inspection available for NRC review, prior to or concurrent with preparations for each operating test or requalification program inspection [10 CFR 55.46(d)]

**6.11.3 10 CFR 55.53(g), Felony Conviction**

See Step 6.10.12. (See also Steps 6.3.4.a.4., 6.8.1, and 6.27.2.a.)



**6.12 10 CFR 70, Domestic Licensing of Special Nuclear Material****6.12.1 10 CFR 70.7(e), Form NRC-3**

See Step 6.5.1.

**6.12.2 10 CFR 70.52, Report of Accidental Criticality**

See Step 6.3.3.c. [10 CFR 70.52(a)]

**6.13 10 CFR 71, Radioactive Material Packaging and Transportation****6.13.1 10 CFR 71.5, Accident Reports**

See Steps 6.3.2.g. and 6.21.2. [10 CFR 71.5(a)(1)(iv)]

**6.13.2 10 CFR 71.17, First Use of NRC Approved Package**

If a package, pre-approved by the general license provisions of 10 CFR 71.17, is to be used for the first time by Dominion:

- a. Radiological Protection shall prepare a written notification that includes:
  - The name of the licensee
  - The license number
  - The package identification number specified in the NRC package pre-approval
- b. If the package is for low-level waste, Nuclear Licensing and Operations Support shall review the notification.
- c. If the package is for spent nuclear fuel, NAF and Nuclear Licensing and Operations Support shall review the notification.
- d. The Senior Vice President Nuclear shall approve the notification.
- e. Before first use of the package, Nuclear Licensing and Operations Support shall submit the notification to the Director, Office of Nuclear Material Safety and Safeguards. [10 CFR 71.17(c)(3)]

**6.13.3 10 CFR 71.95, Packaging Defects [Commitment 3.2.18]**

- a. IF there is an instance where there is significant reduction during use in the effectiveness of any authorized packaging for low-level waste, OR
- b. There are defects with safety significance in the packaging after first use, OR

- c. There are instances which the conditions of approval in the certificate of compliance were not observed in making a shipment, THEN :
1. Radiological Protection shall prepare a report that includes the information specified in 10 CFR 71.95(c)(2).
  2. Licensing (Station) shall review the report.
  3. The Site Vice President shall approve the notification.
  4. Within 60 days, Licensing (Station) shall submit the report to the Director, Spent Fuel Project Office, Office of Nuclear Material Safety and Safeguards.  
[10 CFR 71.95]
- d. IF there is an instance where there is significant reduction during use in the effectiveness of any authorized packaging for spent nuclear fuel, OR
- e. There are defects with safety significance in the packaging after first use, OR
- f. There are instances which the conditions of approval in the certificate of compliance were not observed in making a shipment, THEN :
1. Radiological Protection shall prepare a report that includes the information specified in 10 CFR 71.95(c)(2).
  2. Licensing (Station) shall review the report.
  3. The Site Vice President shall approve the notification.
  4. Within 60 days, Licensing (Station) shall submit the report to the Director, Spent Fuel Project Office, Office of Nuclear Material Safety and Safeguards.  
[10 CFR 71.95]

**6.14 10 CFR 72, Independent Storage of Spent Fuel****6.14.1 10 CFR 72.10(e)(1), Form NRC-3**

See Step 6.5.1.

**6.14.2 10 CFR 72.44, License Condition Reports**

- a. Voluntary or involuntary bankruptcy, see Step 6.10.5.g. [10 CFR 72.44(b)(6)(i)]
- b. Effluent release report—see Step 6.10.3.a.  
[10 CFR 72.44(d)(3), SPS ISFSI TS App. C, 1.4.1, & NAPS TS 5.6.3]
- c. Changes to the physical security plan without prior NRC approval—see Step 6.14.12. [10 CFR 72.44(e) & ISFSI TS App. B, 1.1.1]
- d. Changes to the Emergency Plan without prior NRC approval—see Step 6.10.5.c.

**6.14.3 10 CFR 72.48(d)(2), Report of Changes, Tests, and Experiments (ISFSI)**

- a. Each calendar year, Licensing (Station) shall prepare a report to NRC that contains a brief description of changes, tests, and experiments that did not require NRC approval for which Regulatory Evaluations were prepared including a summary of each Regulatory Evaluation. If none were prepared, a letter shall be submitted stating that no Regulatory Evaluations were required to be reported. [10 CFR 72.48(d)(2)]
- b. The Director Nuclear Station Safety and Licensing shall approve the report.
- c. By March 1 (Surry) and March 31 (North Anna) of the following year, Licensing (Station) shall submit the report to the NRC Region II Office and a copy to Office of Nuclear Material Safety and Safeguards. [10 CFR 72.48(d)(2)]

**6.14.4 10 CFR 72.48(d)(6)(ii), Notice of Spent Fuel Cask Design Change**

A copy of the record for any changes to the design of a spent fuel cask must be provided to the applicable cask certificate holder (cask vendor) within 60 days of implementing the change.

**6.14.5 10 CFR 72.70 Safety Analysis Report Updating**

- a. Every 24 months from the date of the issuance of the license, Nuclear Engineering (ISI/DBD/UFSAR) shall prepare a report to NRC that includes any ISFSI Final Safety Analysis Report pages that have been updated, as delineated in 10 CFR 72.70. If none were updated, a letter shall be submitted stating that no ISFSI FSAR updates were required to be reported.

- b. An NBU Officer of the Company, as designated in LI-AA-200, NRC Licensing Correspondence, shall approve the submittal.
- c. By June 30 every other year (even numbered years), NL&OS shall submit the report to the NRC.

**6.14.6 10 CFR 72.74, Notifications of Accidental Criticality or Loss of SNM**

- a. Accidental criticality—see Step 6.3.3.c.
- b. Loss of special nuclear material—see Steps 6.3.3.d. and 6.3.3.e.

**6.14.7 10 CFR 72.75, ISFSI Specific Events and Conditions**

- a. ISFSI Immediate, Four-Hour, Eight Hour, and Twenty-Four Hour Notifications shall be made in accordance with Steps 6.3.1.b. and 6.3.1.c. and shall include, if available at time of notification: [10 CFR 72.75(e)(3)]
  - 1. The caller's name and call back telephone number
  - 2. A description of the event, including time and date
  - 3. The exact location of the event
  - 4. The quantities, and chemical and physical form of the spent fuel or HLW involved
  - 5. Any personnel radiation exposure data
- b. Emergency Notifications (e.g., Declaration of an emergency)—see Steps 6.3.2 and 6.14.7.f. [10 CFR 72.75(a)]
- c. Non-Emergency Notifications (Four-Hour Notifications) are required for the following ISFSI events or conditions involving spent fuel or High Level Waste (HLW):
  - 1. An action taken in an emergency that departs from a license condition, technical specification, or certificate of compliance when the action is immediately needed to protect the public health and safety and no licensed action that provides adequate or equivalent protection is immediately apparent—see Step 6.3.4 and 6.14.7.f. [10 CFR 72.75(b)(1)]

2. Any event or situation related to the health and safety of the public or onsite personnel, or protection of the environment for which a news release is planned or notification to other Government agencies has been or will be made.  
[10 CFR 72.75(b)(2)]
  3. An event that requires unplanned medical treatment of a radioactively contaminated individual at an offsite medical facility—see Steps 6.3.4 and 6.14.7.f. [10 CFR 72.75(c)(3)]
- d. Non-Emergency Notifications (Eight Hour Notifications) are required for the following ISFSI events involving spent fuel or High Level Waste:
1. A defect in any spent fuel storage structure, system, or component which is important to safety—see Steps 6.3.4 and 6.14.7.f. [10 CFR 72.75(c)(1)]
  2. A significant reduction in the effectiveness of any spent fuel storage confinement system during use—see Steps 6.3.4 and 6.14.7.f.  
[10 CFR 72.75(c)(2)]
- e. Non-Emergency Notifications (Twenty-Four Hour Notifications) are required for the following ISFSI events involving spent fuel or High Level Waste:
1. An event that prevents immediate actions necessary to avoid exposures to radiation or radioactive material that could exceed regulatory limits or releases of radioactive materials that could exceed regulatory limits (e.g., events such as fires, explosions, and toxic gas releases)—see Steps 6.3.4 and 6.14.7.f.  
[10 CFR 72.75(d)(1)(i)]
  2. An event in which safety equipment is disabled or fails to function as designed when:—see Step 6.3.6 [10 CFR 72.75(d)(1)]
    - The equipment is required to be available and operable to prevent releases that could exceed regulatory limits, to prevent exposure to radiation or radioactive materials that could exceed regulatory limits, or to mitigate the consequences of an accident,
    - and
    - No redundant equipment was available and operable to perform the required safety function

3. A violation of the functional and operating limits regarding fuel to be stored at the ISFSI in accordance with NAPS ISFSI TS Section 2.2. **[North Anna]**
  4. A violation of the functional and operating limits regarding fuel to be stored at the ISFSI in accordance with NUHOMS-HD TS Section 2.2.
  - f. Sixty-Day Written Reports following ISFSI specific events or conditions in Steps 6.14.7.c., 6.14.7.d., and 6.14.7.e. and above occur must be sent to the U. S. Nuclear Regulatory Commission, Document Control Desk, Washington, DC 20555, with a copy sent to the NRC Region II Office. Reports must include the information specified in 10 CFR 72.75(g).
- 6.14.8 **10 CFR 72.76, Material Status Report**  
See Step 6.16.2.
- 6.14.9 **10 CFR 72.78, Nuclear Material Transfer Reports**  
See Step 6.16.3.
- 6.14.10 **10 CFR 72.80(a), Other Records and Reports**  
See Step 6.7.2.
- 6.14.11 **10 CFR 72.80(b), Annual Financial Reports**  
See Step 6.10.8.
- 6.14.12 **10 CFR 72.186, Physical Security and Safeguards Contingency Plans**  
If a Station physical security plan, training and qualification plan, or safeguards contingency plan is revised without prior NRC approval, as permitted by 10 CFR 72.186(b):
- a. Security shall prepare a report that describes the change(s).
  - b. The Director Nuclear Security and Emergency Preparedness shall review and approve the report.
  - c. The Vice President Nuclear Operations shall approve the submittal.
  - d. Within two months after the change is implemented, Nuclear Licensing and Operations Support shall submit the report to the Director, NRC Region II Office/Administrator with a copy to the Office of Nuclear Material Safety and Safeguards. **[10 CFR 72.44(e)] and [10 CFR 72.186(b)]**

**6.14.13 10 CFR 72.212(b)(1), Reports on Use of ISFSI Under a General License**

- a. Notification of the NRC prior to first storage of spent fuel under a general license:
  1. At least 120 days prior to storage of spent fuel, Supervisor Nuclear Spent Fuel shall notify Supervisor Licensing (Station) of the date planned for first storage of spent fuel under a general license.
  2. At least 90 days prior to first storage of spent fuel under this general license, the Supervisor Licensing (Station) shall submit a report, approved by the Site Vice President, notifying the Nuclear Regulatory Commission. [10 CFR 72.212(b)(1)(i)]
- b. Registration of the use of each cask with the NRC after using that cask to store spent fuel:
  1. Within 7 days after using a cask to store spent fuel, Supervisor Nuclear Spent Fuel shall notify Supervisor Licensing (Station) of the date the cask was used to store spent fuel.
  2. No later than 30 days after using that cask to store spent fuel the Supervisor Licensing (Station) shall submit a report, approved by the Site Vice President, to register use of each cask with the Nuclear Regulatory Commission.

[10 CFR 72.212(b)(1)(ii)]

**6.15 10 CFR 73, Physical Protection of Plants and Materials****6.15.1 10 CFR 73.37, Irradiated Fuel Shipment**

- a. Before shipment of spent fuel within or through a state, Nuclear Analysis and Fuel shall prepare written notification to the governor or governor's designee. The notification shall include:
  - The name, address and telephone number of the shipper, carrier, and receiver
  - A description of the shipment as specified by the Department of Transportation in 49 CFR 172.202 and 172.203(d)
  - A listing of the routes to be used within the state
  - A statement that the information described in Step 6.15.1.b. is required by NRC regulations to be protected in accordance with the requirements of 10 CFR 73.21

- b. The following information shall be provided in a separate enclosure to the written notification required by Step 6.15.1.a.:
  - The estimated date and time of departure from the point of origin of the shipment
  - The estimated date and time of entry into the governor's state
  - For a single shipment whose schedule is not related to the schedule of any subsequent shipment, statement that schedule information must be protected in accordance with the provision of 10 CFR 73.21 until at least 10 days after the shipment has entered or originated within the state
  - For a shipment in a series of shipments whose schedules are related, a statement that schedule information must be protected in accordance with the provisions of 10 CFR 73.21 until 10 days after the last shipment in the series has entered or originated within the state and an estimate of the date on which the last shipment in the series will enter or originate within the state
- c. The Senior Vice President Nuclear shall approve the notification.
- d. At least seven days (determined by postmark) before transport of a shipment within or through a state, NAF shall mail the notification to the governor or governor's designee. [10 CFR 73.37(f)(1)]
- e. If any schedule changes by more than six hours from that supplied at Step 6.15.1.d., NAF shall notify, by telephone, the office of the governor or the governor's designee. [10 CFR 73.37(f)(4)]

**6.15.2 10 CFR 73.67, Shipment of SNM of Low Strategic Significance**

- a. Before shipment of SNM of low strategic significance, NAF shall notify the receiver of the mode of transport, estimated time of arrival, location of the nuclear material transfer point, name of carrier, and transport identification.  
[10 CFR 73.67(g)(1)(i)]
- b. Upon receipt of a shipment of SNM of low strategic significance, NAF shall notify the shipper as specified by Step 6.16.3. [10 CFR 73.67(g)(2)(ii)]



**6.15.3 10 CFR 73.71, Safeguard Event Reporting****a. Loss of SNM Shipment**

1. See Step 6.3.3.d. [10 CFR 73.71(a)(1)]

**NOTE:** Events that are reportable in accordance with 10 CFR 50.73 need not be duplicated by Step 6.15.3.a.2.

2. Within 60 days after an event that is reportable in accordance with Step 6.3.3.d., a report shall be submitted as an LER attachment, as specified in Step 6.10.11.c. A copy of the LER shall be sent to the NRC Regional Office with a copy to the Director, Division of Nuclear Security and Incident Response. The report shall include sufficient information for NRC analysis and evaluation. [10 CFR 73.71(a)(4)]
3. If significant supplemental information becomes available after an initial one-hour notification or LER submittal, see Step 6.3.3.d. Licensing (Station) shall prepare a supplemental LER. [10 CFR 73.71(a)(5)]
4. Errors discovered in a report shall be corrected in a revised report with the revisions indicated. Revised reports shall completely replace prior reports. They shall not consist only of revised parts or a supplement. [10 CFR 73.71(a)(5)]

**b. Other Safeguards Events**

1. See Step 6.3.3.e. and 6.3.3.h. [10 CFR 73.71(b)(1)]

**NOTE:** Events that are reportable in accordance with 10 CFR 50.73 need not be duplicated by Step 6.15.3.b.2.

2. Within 60 days after an event reportable in accordance with Step 6.3.3.e. and 6.3.3.h., an LER shall be submitted for the event as specified in Step 6.10.11.c. [10 CFR 73.71(d)]

**6.15.4 10 CFR 73.72, Irradiated Fuel Shipments**

- a. For each shipment of irradiated fuel, NAF shall prepare a written notification that includes [10 CFR 73.72(a)(3)]:
  - The name, address, and telephone number of the shipper, receiver, and carrier
  - The physical form, quantity, type of reactor, and original enrichment
  - A listing of the mode of shipment, transfer point, and route to be used
  - The estimated time and date that shipment will begin
  - The estimated time and date of arrival of the shipment at the destination
- b. Nuclear Licensing and Operations Support shall submit the notification to the NRC Director, Division of Nuclear Security and Incident Response in sufficient time that it will be received at least 10 days before transport begins. [10 CFR 73.72(a)(2)]
- c. At least 2 days before transport begins, Nuclear Licensing and Operations Support shall notify the NRC Headquarters Operations Center. See Step 6.1.1.a.  
[10 CFR 73.72(a)(4)]
- d. Nuclear Licensing and Operations Support shall notify the NRC Headquarters Operations Center of any shipment itinerary changes greater than  $\pm 6$  hours. See Step 6.1.1.a.

**6.15.5 10 CFR 73, Appendix G, Safeguards Events**

Events to be reported within one hour; see Step 6.3.3.e.

**6.16 10 CFR 74, Material Control and Accounting of Special Nuclear Material****6.16.1 10 CFR 74.11, Loss or Theft or Attempted Theft of SNM**

See Step 6.3.3.e.

**6.16.2 10 CFR 74.13, Material Status Report**

- a. Nuclear Analysis and Fuel (NAF) shall prepare a material status report in computer readable format within 60 calendar days of the beginning of the physical inventory.  
[10 CFR 74.13(a)].
- b. The report shall provide information concerning special nuclear material received, produced, possessed, transferred, consumed, disposed of, or lost during the report period.
- c. NAF shall also prepare in computer readable format a statement the composition of the ending inventory. The report shall be submitted as an attachment to the material status report.

- d. The Director NAF or Director NLOS shall approve the report.
- e. The computer readable reports shall be prepared and submitted in accordance with instructions NUREG/BR-0007 and NMMSS Report D-24, Personal Computer Data Input for NRC Licensees.

#### 6.16.3 **10 CFR 74.15, Nuclear Material Transfer**

##### a. **Shipment of SNM**

For each SNM shipment of 1 gram or more of contained uranium-235, uranium-233, or plutonium:

1. NAF shall prepare in computer readable format, Nuclear Material Transaction Report (Shipper), in accordance with the printed instructions from NUREG/BR-0006 and NMMSS Report D-24.
2. The Director NAF or Director NLOS shall approve the report.
3. Promptly, NAF shall submit the report to the DOE and a copy to the receiver.

##### b. **Receipt of SNM (Domestic Source)**

For each SNM receipt of 1 gram or more of contained uranium-235, uranium-233, or plutonium, received:

1. NAF shall prepare in computer readable format, Nuclear Material Transaction Report (Receiver), in accordance with the printed instructions from NUREG/BR-0006 and NMMSS Report D-24.
2. The Director NAF or Director NLOS, shall approve the report.
3. Within 10 days after receipt, unload, and verification, NAF shall submit the report in accordance with the printed instructions.

#### 6.17 **10 CFR 140, Financial Protection and Indemnity Agreements**

##### 6.17.1 **10 CFR 140.6, Reports**

In the event of bodily injury or property damage arising out of or associated with possession or use of radioactive material at the Station or transportation of radioactive material, or in the event such a claim is made:

- a. Corporate Risk Management shall prepare written notice to identify, as reasonably obtainable, the time, place, and circumstances or nature of the event. |
- b. Nuclear Licensing and Operations Support shall review the notice.
- c. The Senior Vice President Nuclear Operations shall approve the notice.

- d. As promptly as practical, Nuclear Licensing and Operations Support shall submit the notice to the Director, Nuclear Reactor Regulation, or Director, Nuclear Material Safety and Safeguards. [10 CFR 140.6(a)]

**6.17.2 10 CFR 140.15, Proof of Financial Protection**

In the event of a material change in the proof of financial protection or other financial information filed with NRC to comply with 10 CFR 140.15:

- a. Corporate Risk Management shall prepare a written notice to describe the change. |
- b. Promptly, Nuclear Licensing and Operations Support shall submit the notice to the Director, Nuclear Material Safety and Safeguards. [10 CFR 140.15(e)]

**6.17.3 10 CFR 140.17, Policy Renewal or Replacement**

If liability insurance policies obtained to provide all or part of the financial protection required by 10 CFR 140 are to expire, require renewal, or be replaced by another form of protection:

- a. Corporate Risk Management shall prepare written notice that indicates renewal of the policy or shall obtain other proof of financial protection as required by Step 6.17.2. |
- b. Nuclear Licensing and Operations Support shall review the notice.
- c. The Senior Vice President Nuclear Operations shall approve the notice.
- d. At least 30 days before policy termination, Nuclear Licensing and Operations Support shall submit the notice to the Director, Nuclear Reactor Regulation, or Director, Nuclear Material Safety and Safeguards. [10 CFR 140.17(b)]

**6.17.4 10 CFR 140.21, Guarantees of Deferred Premium Payment**

Annually, for each licensed reactor:

- a. Corporate Accounting shall prepare a report that establishes that Dominion maintains one of the following types of guarantee of payment of deferred premiums in an amount of \$15 million:
  - Surety bond
  - Letter of credit
  - Revolving credit and term loan arrangements
  - Maintenance of escrow deposits of government securities
  - Annual, certified financial statement showing that either that a cash flow (i.e., cash available to a company after all operating expenses, taxes, interest charges, and dividends have been paid) can be generated and would be available for payment of retrospective premiums within three months after submission of the statement, or a cash reserve or a combination of cash flow and cash reserve
  - Another type of guarantee approved by NRC
- b. Nuclear Licensing and Operations Support shall review the report.
- c. The Director NL&OS shall approve the report.
- d. Before April 1 of each year, Nuclear Licensing and Operations Support shall submit the report to the Director, Nuclear Reactor Regulation, or Director, Nuclear Material Safety and Safeguards.

**6.18 18 CFR 12, Water Power Project Safety (Lake Anna Dam)****6.18.1 18 CFR 12.10(a), Conditions Affecting the Safety of a Project**

**NOTE:** “Condition that affects the safety of” is defined at Subsection 4.8 (the Main Dam Daily Inspection form identifies a number of such conditions).

If a condition is identified that affects the safety of the dam or associated features, but does not require entry to the Emergency Action Plan for Lake Anna Dam:

- a. See Step 6.3.2.i.
- b. Licensing (Station) shall prepare a report that contains any information the FERC Regional Engineer directs, including:
  - The causes of the condition
  - A description of any unusual occurrences or operating or operating circumstances preceding the condition
  - An account of any measure taken to prevent worsening of the condition
  - A detailed description of any damage to project works and the status of any repair
  - A detailed description of any personal injuries
  - A detailed description of the nature and extent of any private property damages
  - Any other relevant information requested by the FERC Regional Engineer
- c. A description shall be enclosed (with the report) of any modification that is an emergency measure taken in response to a condition affecting the safety of the dam or its works. This description is required even if the modification does not otherwise require specific, prior, FERC approval. See also Step 6.18.8. [18 CFR 12.11(a) & (b)]
- d. The Site Vice President shall review and approve the report.
- e. Within the time specified by the FERC Regional Engineer, Licensing (Station) shall submit the report to the FERC Regional Office.

**6.18.2 18 CFR 12.10(b), Deaths or Serious Injuries At or Near the Dam**

If a serious accident or a death occurs at or immediately above or below Lake Anna Dam<sup>1</sup>, or is alleged to be related to the existence or operation of the dam: [18 CFR 12.10(b)]

- a. See Step 6.3.2.h.
- b. Licensing (Station) shall prepare Attachment 2, FERC Public Safety Database Report, and a transmittal letter. Additional information, such as newspaper articles, maps, and law enforcement agency reports should be attached, and may be required. Any action to prevent recurrence shall be described in the transmittal letter.
- c. The Manager Nuclear Operations shall review the letter and report.
- d. The Site Vice President shall approve the letter and report, including notary verification as specified by 18 CFR 12.13, Verification form.
- e. Within 72 hours after discovery, Licensing (Station) should submit the report to the FERC Regional Office. [Commitments 3.2.13 and 3.2.15]

**6.18.3 18 CFR 12.11, Modifications to the Dam or Its Works**

Except as noted at Step 6.18.1.c., if modifications to the dam or its works are planned:

- a. Nuclear Engineering shall notify Electric Environmental Services and Licensing (Station) as specified in VPAP-0301, Design Change Process.
- b. Nuclear Engineering shall prepare a report that describes the modifications.
- c. The Site Vice President shall review and approve the report.
- d. At least 60 days before work on the modification begins, Licensing (Station) shall submit the report to the FERC Regional Office.[18 CFR 12.11(a) & (c)]

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1. Incidents which involve other parts of the lake are excluded. [18 CFR 12.10(b)(4)]

**6.18.4 18 CFR 12.24, Review and Updating of Emergency Action Plans**

- a. If Dominion discovers that a significant change has occurred in upstream or downstream circumstances that might affect water flows or the location or extent of the areas, persons, or property that might be harmed in an emergency that involves the dam:
  1. The Director Nuclear Protection Services and Emergency Preparedness shall prepare a notification of the change in circumstances.
  2. The Site Vice President shall approve the notification.
  3. Licensing (Station) shall submit the notification to the FERC Regional Engineer and the State Water Control Board.
- b. When a new independent consultant report is issued, as required by Step 6.18.7, Nuclear Emergency Preparedness shall review the report and update, as necessary, applicable sections of the North Anna Hydroelectric Project Emergency Action Plan by replacing the previous report in the Plan<sup>1</sup>, and implementing any corresponding changes to the Plan.
- c. Nuclear Emergency Preparedness shall prepare a letter<sup>2</sup> to submit the annual North Anna Hydroelectric Project Emergency Action Plan adequacy review. If the Plan has been revised, submit three copies of the revised Plan to the FERC.
  1. The Site Vice President shall approve the letter.
  2. By December 31 each year, Licensing (Station) shall submit the letter to the FERC Regional Engineer. [NAHP EAP, App. B.3]

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1. Independent Consultant reports are an integral part of the North Anna Hydroelectric Project Emergency Action Plan. When a new report is issued, applicable sections of the plan should be updated, as necessary, to reflect updated information.

2. The same letter may also submit the exercise summary and critique required by Step 6.18.5.



**6.18.5 18 CFR 12.25, Posting and Readiness**

- a. The Station Coordinator Emergency Preparedness shall ensure that a copy of the current North Anna Hydroelectric Project Emergency Action Plan is posted at the spillway office, the hydroelectric building, and in the North Anna Control Room.
- b. Nuclear Emergency Preparedness shall prepare a letter to submit the annual North Anna Hydroelectric Project Emergency Action Plan test exercise summary and critique.
- c. The Site Vice President shall approve the letter.
- d. Within 30 days after performing a test exercise, but no later than December 31 of each year, Licensing (Station) shall submit the letter to the FERC Regional Engineer. [NAHP EAP V.E and App. B.2]

**6.18.6 18 CFR 12.36, Emergency Corrective Measures**

If, during an inspection, an independent consultant discovers any condition for which emergency corrective measures are advisable:

- a. The independent consultant shall notify Nuclear Engineering.
- b. Nuclear Engineering shall notify the Shift Manager. See Step 6.3.2.i.

**6.18.7 18 CFR 12.37-39, Independent Consultant Reports**

Nuclear Engineering shall obtain an independent consultant report for each five-year inspection required by 18 CFR 12.37(c). The contract for the independent consultant shall include the notification requirement of Step 6.18.6.a. Nuclear Engineering shall send one copy of the report to Nuclear Emergency Preparedness and three copies to Licensing (Station). Licensing (Station) shall submit three copies of the Independent Consultant Report to the FERC Regional Engineer as required by 18 CFR 12.37(a). See Step 6.18.4.b.

**6.18.8 18 CFR 12.42, Warning and Safety Devices**

Except as noted at Step 6.18.1.c., if it is planned to remove a safety device from service:

- a. The Shift Manager shall notify Licensing (Station).
- b. Licensing (Station) shall prepare a notification letter to the FERC Regional Engineer that includes:
  - The reason for removing the device from service
  - The proposed date of removal
  - The schedule for return to service
  - Any mitigating actions to be taken
- c. The Site Vice President shall review and approve the letter.
- d. At least 10 days before the device is removed from service, Licensing (Station) shall submit the letter to the FERC Regional Engineer. **[Commitment 3.2.14]**
- e. When the device has been returned to service, the Shift Manager shall notify Licensing (Station).
- f. Licensing (Station) shall prepare a notification letter to the FERC Regional Engineer.
- g. The Site Vice President shall approve and verify the statement, as specified by 18 CFR 12.13, Verification form.
- h. Within 10 days after the device is returned to service, Licensing (Station) shall submit the letter to the FERC Regional Engineer. **[Commitment 3.2.14]**

**6.18.9 18 CFR 12.44(b), Spillway Gate Test**

If each spillway gate is not operated on a test basis during the periodic FERC inspection:

- a. Licensing (Station) shall prepare a statement that each spillway has been operated at least once during the twelve months preceding the inspection.
- b. The Site Vice President shall approve and verify the statement, as specified by 18 CFR 12.13, Verification form.
- c. By December 31, Licensing (Station) shall submit the statement to the FERC Regional Engineer.

**6.18.10 18 CFR 12.44(c), Emergency Diesel Load Test**

- a. Licensing (Station) shall prepare a statement that describes the intervals at which the emergency diesel generator was load tested during the year preceding the annual FERC inspection.
- b. The Site Vice President shall approve and verify the statement, as specified by 18 CFR 12.13, Verification form.
- c. By December 31, Licensing (Station) shall submit the statement to the FERC Regional Engineer.

**6.19 29 CFR 1900, Occupational Safety and Health Administration****6.19.1 29 CFR 1904, Reporting Occupational Injuries and Illnesses****a. 29 CFR 1904.32, Annual Summary Posting**

1. Each year, Nuclear Site Safety (Station) shall prepare an OSHA form No. 300 - Log of Work-Related Injuries and Illnesses, that contains an annual summary of occupational injuries and illnesses for the Station during the previous calendar year. The form shall include:
  - The calendar year covered by the report
  - “Dominion,” address, and Station name
  - Supervisor Nuclear Site Safety (Station)
2. Nuclear Site Safety (Station) shall post the form from February 1 to April 30 on the turbine building entry bulletin board (**North Anna**) “Safety” bulletin board in the service building hallway (**Surry**).

**b. 29 CFR 1904.39, Reporting Fatalities or Multiple Hospitalization Accidents**

See Step 6.3.5.c.

**6.19.2 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response**

**NOTE:** Lists of hazardous materials and associated reportable quantities are updated frequently. Consult with the Environmental Compliance Coordinator if you have any doubt about the classification of a material or its reportability threshold.

See Step 6.3.2.e.

**6.20 40 CFR, Protection of Environment****6.20.1 40 CFR 61, National Emissions Standards for Hazardous Air Pollutants - Asbestos**

See Step 6.27.3.b.

**6.20.2 40 CFR 82, Protection of Stratospheric Ozone**

- a. For commercial refrigeration units that contain a charge of more than 50 pounds of refrigerant, leaks greater than 35% per year must be repaired within thirty days of the date of discovery, or within 30-days of a failed follow-up verification test, except when a retrofit/retirement plan is developed within thirty days and actions under that plan are completed within one year from the plan's date.
- b. For comfort-cooling equipment with a charge of more than 50 pounds, leaks greater than 15% per year must also be repaired within thirty days of the date of discovery, or within 30-days of a failed follow-up verification test, except when a retrofit/retirement plan is developed within thirty days and actions under that plan are completed within one year from the plan's date.
- c. Additional time (beyond the 30-day time period) is allowed to conduct leak repairs if the necessary repair parts are unavailable or if other applicable federal, state, or local regulations make a repair within 30 impossible. EPA must be notified per 40 CFR 82.166(n).
- d. If repairs cannot be completed within 30-days of discovery or within 30-days of a failed follow-up verification test, the EPA must be notified in accordance with 40 CFR 82.166(n). The report shall be sent to the address listed in 40 CFR 82.160.

**6.20.3 40 CFR 110, Discharge of Oil**

See Step 6.3.2.d.

**6.20.4 40 CFR 112, Oil Pollution Prevention**

If more than 1000 gallons of oil are released into or upon navigable waters or adjoining shorelines in a single event, or if there are two release events to navigable waters within any 12 month period, Electric Environmental Services shall submit a package to the EPA Regional Administrator that includes:

- The name of the facility
- Name of the owner or operator
- Location of the facility
- Date and year of initial facility operation
- The maximum storage capacity of the facility
- A description of the facility, including maps, flow diagrams, and topographical maps
- A complete copy of the Plan and any amendments
- The cause of the release, including a failure analysis of system or subsystem in which the failure occurred
- Corrective actions or countermeasures taken, including and adequate description of equipment repairs or replacements
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence
- Any other information the Regional Administrator may request

**6.20.5 40 CFR 117, Hazardous Substance Reportable Quantities**

See Step 6.3.2.e.

**6.20.6 40 CFR 190, Environmental Radiation Protection Standards**

See Step 6.6.4.a.4.

**6.20.7 40 CFR 262, Standards Applicable to Generators of Hazardous Waste****a. Biennial Report**

1. Electric Environmental Services shall prepare EPA Form 8700-13A to cover the previous year, including:
  - The EPA identification number, name, and address of the generator
  - The calendar year covered by the report
  - The EPA identification number, name, and address for each off-site treatment, storage, or disposal facility to which the waste was shipped during the year
  - The name and EPA identification number of each transporter used during the reporting year
  - A description, EPA hazardous waste number (from 40 CFR 261, Subpart C or D), DOT hazard class, and quantity of each hazardous waste shipped off site, listed by EPA identification number of each such off-site facility to which a waste was shipped
  - A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated
  - A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years before 1984
2. By March 1 of each even numbered year, Electric Environmental Services shall submit the report to the EPA Regional Administrator. [40 CFR 262.41]

**b. Exception Reporting**

1. Hazardous waste shipments require a shipment form (see 40 CFR 262). If a copy of the form, signed by the disposal site operator, is not returned to the shipper within 35 days, the Environmental Compliance Coordinator shall notify Electric Environmental Services.
2. If the signed form still has not been returned, by the 45th day after shipment, Electric Environmental Services shall prepare and submit an Exception Report to the EPA Regional Administrator that includes [40 CFR 262.42]:
  - A legible copy of the unacknowledged manifest
  - A cover letter that explains efforts to locate the hazardous waste and the results of those efforts

**6.20.8 40 CFR 302, Reportable Quantities and Notification**

See Step 6.3.2.e.

**6.20.9 40 CFR 355.30, Extremely Hazardous Substances**

If the Station ever has an extremely hazardous substance in an amount greater than its threshold planning quantity, as established by Appendix A or B of 40 CFR 355.30, the Station will be subject to the requirements of 40 CFR 355. If this occurs, the Environmental Compliance Coordinator shall notify the Local Emergency Planning Coordinator within 60 days and shall initiate appropriate change requests to this procedure to implement the corresponding reporting requirements.

**6.20.10 40 CFR 370, Hazardous Chemical Reporting: Community Right-to-Know****a. Material Safety Data Sheet (MSDS) Reporting**

If significant new information is discovered concerning a hazardous substance for which an MSDS was submitted previously or a new substance exceeds the minimum threshold level for reporting as established by 40 CFR 370.20, within three months, the Environmental Compliance Coordinator shall submit a new or revised MSDS for that substance to the State Department of Environmental Quality (Waste), the Local Emergency Planning Coordinator, and all applicable fire departments. [40 CFR 370.21(c)]

**b. Inventory Reporting**

1. Each year, the Environmental Compliance Coordinator shall prepare a Tier I information form (40 CFR 370.41) on hazardous chemicals present at the Station above the threshold levels established in 40 CFR 370.20(b).
2. By March 1 of each year, the Environmental Compliance Coordinator shall submit the form for the previous year to the State Department of Environmental Quality (Waste), the Local Emergency Planning Coordinator, and applicable fire departments. [40 CFR 370.25(a)]

**6.20.11 40 CFR 761, Polychlorinated Biphenyls (PCBs)**

See Step 6.3.2.e.

**6.21 49 CFR 171, Hazardous Materials Transport Incidents**

- 6.21.1 If an incident occurs during transport (including loading, unloading, and temporary storage) of hazardous materials, see Step 6.3.2.g. [49 CFR 171.15]
- 6.21.2 If:
- The Department of Transportation (DOT) is notified as specified by Step 6.3.2.g.
  - There is an unintentional release of hazardous materials from a package (including a tank), or
  - Any quantity of hazardous waste has been discharged during transportation:
    - a. The Environmental Compliance Coordinator shall prepare a report on DOT Form F 5800.1.<sup>1</sup>
    - b. Nuclear Licensing and Operations Support shall review the report.
    - c. The Senior Vice President Nuclear Operations shall approve the report.
    - d. Within 15 days, Nuclear Licensing and Operations Support shall submit the report to DOT. [49 CFR 171.16]
- 6.21.3 If a hazardous substance is discharged (accidentally or intentionally) in a reportable quantity from one package, or transport vehicle if not packaged, into or upon the navigable waters or adjoining shorelines, see Step 6.3.2.e.

**6.22 Federal Environmental & Wildlife Protection Acts**

- 6.22.1 **Clean Air Act**  
See Step 6.22.3.
- 6.22.2 **Clean Water Act**  
See Step 6.22.3.

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1. If the report pertains to a hazardous waste discharge, a copy of the hazardous waste manifest for the waste shall be attached to the report and an estimate of the quantity of the waste removed from the scene, the name and address of the facility to which it was taken, and the manner of disposition of any unremoved waste must be entered in Part H of the form. [49 CFR 171.16(a)]



**6.22.3 Comprehensive Environmental Responsibility, Compensation and Liability Act<sup>1</sup> (CERCLA)**

**NOTE:** CERCLA notification requirements do not apply to releases that are entirely on-site.

- a. See Step 6.3.2.e.
- b. If notifications are made as specified in Step 6.3.2.e.:
  1. Electric Environmental Services shall prepare a report (as notices or additional information become available) that updates information provided in the immediate notification and that includes additional information with respect to:
    - Actions taken to respond to and to contain the release
    - Any known or anticipated acute or chronic health risks associated with the release
    - Where appropriate, advice regarding medical attention necessary for exposed individuals
  2. The Site Vice President shall review the report.
  3. The Director Electric Environmental Services shall approve the report.
  4. As soon as practicable, Electric Environmental Services shall submit the report to all agencies notified in accordance with Step 6.3.2.e., except the National Response Center. [CERCLA Sec. 304(c)]

**6.22.4 Migratory Bird Treaty Act**

If an osprey nest is disturbed or a raptor (bird of prey) is injured or killed by electrocution, notify the Environmental Compliance Coordinator. The Environmental Compliance Coordinator shall collect the information necessary to complete a Raptor (Bird of Prey) Incident Report (form no. 721841), and notify Electric Environmental Services at one of the telephone numbers provided on the form.

**6.22.5 Superfund Amendments and Reauthorization Act of 1986<sup>2</sup> (SARA)**

Includes Emergency Planning and Community Right-To-Know Act of 1986<sup>3</sup>. See Steps 6.3.2.e., 6.20.7, and 6.20.10.

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1. 42 U.S.C. §§9601-57 (1982)

2. Pub. L. 99-499, 100 Stat. 1613 (1986)

3. Pub. L. 99-499.

**6.23 North Anna Units 1 & 2 License and Technical Specifications/Topical Report**

**NOTE:** North Anna Independent Spent Fuel Storage Installation License and Technical Specifications reporting requirements are included with the requirements for 10 CFR 50.36a at Step 6.10.3 and 10 CFR 72 at Subsection 6.14.

**6.23.1 Special Report Review**

FSRC shall review all special reports submitted to NRC.

**6.23.2 Reportable Events**

- a. For all NRC-reportable events, NRC shall be notified as specified in Step 6.10.10 and an LER submitted as specified in Step 6.10.11.
- b. FSRC shall review each event reported by an LER and send the results to the Senior Vice President Nuclear Operations and the MSRC. [Topical Report]

**6.23.3 Safety Limit Violations**

If a technical specification safety limit is violated, see Steps 6.10.11 and 6.3.2.a.5.

**6.23.4 Inservice Inspection Reports**

After each refueling outage:

- a. Nuclear Engineering shall prepare Owner's Report for Repairs or Replacements, Form NIS-2 (ASME Section XI) in accordance with the Dominion Inservice Inspection Manual.
- b. Nuclear Engineering shall prepare Owner's Activity Report, Form OAR-1 (ASME Section XI) in accordance with the Dominion Inservice Inspection Manual.
- c. The Site Vice President, Director NSS&L, or Director NLOS shall approve the reports.
- d. Licensing (Station or Corporate) shall submit the OAR-1 to the NRC.

[ASME IWA-6000]

**6.23.5 Changes Related to Radioactivity in Effluents**

If it is planned to remove or change significantly the normal operation of equipment that controls the amount of radioactivity in effluents (regardless of whether the change affects the amount of radioactivity in the effluents):

- a. Licensing (Station) shall prepare a report that describes the planned change.

- b. Nuclear Licensing and Operations Support shall review the report.
- c. The Senior Vice President Nuclear Operations shall approve the report.
- d. Before the change is implemented, Nuclear Licensing and Operations Support shall submit the report to NRC. [Unit 1 License, 2.C.(3)(b); Unit 2 License, 2.C.(3)(a)]

#### 6.23.6 Violations of Requirements of the License

- a. See Step 6.3.6.d.
- b. If NRC is notified as specified in Step 6.3.6.d.:
  - 1. Licensing (Station) shall prepare a follow-up report.
  - 2. The Senior Vice President Nuclear Operations shall approve the report.
  - 3. Within 14 days after discovery of the violation, Nuclear Licensing and Operations Support shall submit the report to the NRC Regional Office.  
[Unit 2 License, 2.C(3)(a)]

#### 6.23.7 Steam Generator Tube Inspection Reports

##### a. Steam Generator Tube ISI

If performance criterion is exceeded and results require prompt notification to the Commission pursuant to Section 50.72 to 10 CFR Part 50, an LER shall be submitted pursuant to Section 50.73 to 10 CFR Part 50. The LER should include a root cause evaluation identifying the performance criteria exceeded and an operational assessment establishing the bases for the next operating cycle.

##### b. Tube Inspection Report [TS 5.6.7]

Engineering Programs - ISI/IST/Materials (Station) shall prepare a report for submittal by Licensing (Station) to the NRC within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, Steam Generator (SG) Program. The report shall be approved by the Site Vice President and shall include:

- 1. The scope of inspections performed on each SG.
- 2. Active degradation mechanisms found.
- 3. Nondestructive examination techniques utilized for each degradation mechanism.

4. Location, orientation (if linear), and measured sizes (if available) of service induced indications.
5. Number of tubes plugged during the inspection outage for each active degradation mechanism.
6. Total number and percentage of tubes plugged to date.
7. The results of condition monitoring, including the results of tubes pulled and the in-situ testing.
8. The effective plugging percentage for all plugging in each SG.

#### 6.23.8 Core Operating Limits Report

- a. NAF shall prepare a report for each refueling that provides the information specified in Technical Specification 5.6.5 (Surry TS 6.2.C.)

**NOTE:** Any information needed to support N(Z) and/or the Axial Flux Difference limits will be by NRC request and need not be included in this report.

- b. FSRC shall review the report.
- c. The Director NL&OS or Director NSS&L shall approve the report.
- d. When issued, Nuclear Licensing and Operations Support shall submit the report to NRC and copies to the NRC Regional Office and the NRC Resident Inspector.

[TS 5.6.5]

#### 6.23.9 Annual Radiological Environmental Operating Report

- a. Radiological Protection shall prepare a draft Radiological Environmental Operating Report<sup>1</sup> for each calendar year. The report shall be consistent with the objectives outlined in VPAP-2103N, Offsite Dose Calculation Manual (North Anna), VPAP-2103S, Offsite Dose Calculation Manual (Surry) , and 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

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1. A single submittal is acceptable for both units.

- b. The report shall provide summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program during the year, including:
- A summary description of the Radiological Environmental Monitoring Program
  - Analysis results of radiological environmental samples and of all environmental radiation measurements, taken during the period pursuant to the locations specified in the tables and figures of the ODCM as well as summarized and tabulated results of these analyses and measurements commensurate with the format in the ODCM. If some results are not available for inclusion with the report, the missing information shall be identified, and their unavailability explained. Missing information shall be submitted in a supplemental report as soon as possible [TS 5.6.2]
  - Comparisons (as appropriate) with preoperational studies, operational controls, and previous environmental surveillance reports
  - At least two legible maps that include sampling locations, keyed to a table that gives distances and directions from the centerline of one reactor. One map shall include locations near the site boundary; the second shall include more distant locations
  - Land use census results
  - Descriptions of radionuclide levels—not due to plant effluents—that would otherwise have required a special report as specified in Step 6.10.16
  - A discussion of deviations from the sampling schedule as specified by VPAP-2103N
  - A discussion of analyses in which the lower limit of detection (LLD) as specified by VPAP-2103N was not achievable
  - If Interlaboratory Comparison Program analyses were not performed as required by VPAP-2103N, a description of corrective actions to prevent recurrence
  - An assessment of the observed impacts of Station operation on the environment
- c. If the Radiological Environmental Monitoring Program was not conducted as specified in VPAP-2103N, the report shall state the reasons, describe actual or planned corrective action, and actions to prevent a recurrence.

- d. Radiological Protection shall forward the draft to Licensing (Station). Licensing (Station) shall complete preparation of the report with assistance from others as required.
- e. The Manager Radiological Protection and Licensing (Station) shall review the report.
- f. The Director Nuclear Station Safety and Licensing shall approve the report.
- g. Before May 1 of the following year, Licensing (Station) shall submit the report to the NRC. [TS 5.6.2]

**6.23.10 Annual Radiological Effluent Release Report**

See Step 6.10.3. [TS 5.6.3]

**6.23.11 Special Reports**

- a. Licensing (Station) shall prepare the special reports within the time period specified for each report pursuant to the requirements of the applicable specification.
- b. FSRC shall review the reports.
- c. The Site Vice President shall approve the reports.
- d. On the schedule specified in the Technical Specifications, Site Vice President shall submit the reports to NRC.

**6.23.12 Offsite Dose Calculation Manual (ODCM)**

If VPAP-2103N, Offsite Dose Calculation Manual (North Anna), VPAP-2103S, Offsite Dose Calculation Manual (Surry), is revised, a complete, legible copy shall be submitted with the Radiological Effluent Release Report for the year in which the revision is implemented. See Step 6.10.3. [TS 5.6.3]

**6.23.13 Post Accident Monitoring (PAM) Report**

- a. When required by Condition B of LCO 3.3.3, Licensing (Station) shall prepare PAM Report. [TS 5.6.6]
- b. The report shall outline the cause of inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.
- c. FSRC shall review the report.
- d. The Site Vice President shall approve the report.

- e. The report shall be submitted to the NRC within the following 14 days when the report is required by Condition B of LCO 3.3.3.

**6.23.14 Reactor Pressure Vessel (RPV) Head Related Inspection Results**

- a. RPV head and penetration inspections, on a time period related to effective degradation years, are required by Revised NRC Order EA-03-009 Paragraph IV.C. For each of these inspections, a report detailing the inspection results is required to the NRC.
- b. For any boron deposits discovered on the surface of the RPV head or related insulation, regardless of the source of the deposit, Revised NRC Order EA-03-009 Paragraph IV.D requires inspections of the affected RPV head surfaces and penetrations. If a leak or boron deposit is found a report detailing the results to the NRC is required.
- c. For the above reports to the NRC, within 45 days after the plant is returned to operations the inspection results will be provided to the Supervisor Licensing (Station) by the site Boric Acid Corrosion Control (BACC) Coordinator and by the Supervisor ISI/IST/Materials Engineering (Station) for nonvisual NDE inspections.
- d. For the above reports to the NRC, within 60 days after the plant is returned to operations, the Supervisor Licensing (Station) shall submit a report, approved by the Site Vice President, detailing the inspection results to the NRC, as required by Revised NRC Order EA-03-009 Paragraph IV.E.

**6.23.15 Technical Specification (TS) Bases Changes**

- a. Changes to the TS Bases implemented without prior NRC approval, including TS Bases revisions transmitted to the NRC for information as part of a TS change request, shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e). [TS 5.5.13.d]
- b. Licensing (Station) shall prepare the transmittal.
- c. The Director NSS&L shall approve the transmittal.
- d. Consistent with Step 6.10.9.c., by October 15 of every year, Licensing (Station) shall transmit the TS Bases changes to the NRC.

## **6.24 Surry License and Technical Specifications**

**NOTE:** Surry Independent Spent Fuel Storage Installation License and Technical Specifications reporting requirements are included with the requirements for 10 CFR 50.36a at Step 6.10.3 and 10 CFR 72 at Subsection 6.14.

### **6.24.1 Special Report Review**

See Step 6.23.1.

### **6.24.2 Reportable Events**

- a. See Step 6.23.2.a. [TS 6.2.A.1]
- b. See Step 6.23.2.b.
- c. See Step 6.10.10. [TS 6.2.B]

### **6.24.3 Safety Limit Violations**

See Step 6.23.3.

### **6.24.4 Startup Report**

- a. NAF shall prepare a summary report of plant startup and power escalation testing after:
  - Receiving a license amendment that involves a planned power level increase
  - Installing a different fuel design
  - Installing fuel from a different manufacturer
  - Making plant modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant
- b. The report shall describe:
  - Each of the tests identified in the UFSAR
  - The measured values of the operating conditions or characteristics obtained during the test program and compare these values with design predictions and specifications
  - Any corrective actions required to obtain satisfactory operation
  - Any additional specific details requested in license conditions based on other commitments
- c. FSRC shall approve the report.



- d. Nuclear Licensing and Operations Support shall submit the report to NRC [TS 6.6.A.1] and copies to the MSRC and the NRC Regional Office [TS 6.6.A.1] within 90 days after the earlier of:
- Startup test program completion
  - Resumption of commercial power operation

#### 6.24.5 **Inservice Inspection Reports**

See Step 6.23.4. [ASME IWA-6000]

Required reports shall include the information required by the 1998 Edition, with 2000 Addenda of the ASME Section XI, Appendix IV, Article IWB-7000.

#### 6.24.6 **Annual Reports**

**NOTE:** This report can be submitted in conjunction with the Report of Individual Monitoring—see Step 6.6.7.

Each year Radiological Protection shall provide a report input for the previous calendar year that includes the results of specific activity analyses in which the primary coolant exceeded the limits of Technical Specification 3.1.D.4. The input shall include the information specified in 3.1.D.4. [TS 6.6.A.2.b]

- a. Radiological Protection shall forward the input to Licensing (Station).
- b. Licensing (Station) shall complete preparation of the report with assistance from others as necessary.
- c. Licensing (Station) shall review the report.
- d. The Director Nuclear Station Safety and Licensing shall approve the report.
- e. By April 30 each year, Licensing (Station) shall submit the report for the previous year to the NRC Regional Office.

#### 6.24.7 **Core Operating Limits Report**

See Step 6.23.8. [TS 6.2.C.]

**6.24.8 Annual Radiological Environmental Operating Report**

- a. Radiological Protection shall prepare a draft Radiological Environmental Operating Report<sup>1</sup> for each calendar year. The report shall be consistent with the objectives outlined in VPAP-2103N, Offsite Dose Calculation Manual (North Anna), VPAP-2103S, Offsite Dose Calculation Manual (Surry) , and 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.
- b. The report shall provide summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program during the year, including:
  - A summary description of the Radiological Environmental Monitoring Program
  - Analysis results of radiological environmental samples and of environmental radiation measurements, summarized and tabulated in the format of the table in the Radiological Assessment Branch Technical Position: An Acceptable Radiological Environmental Monitoring Program. If some results are not available, the missing information shall be identified, and their unavailability explained. Missing information shall be submitted in a supplemental report as soon as practicable
  - Comparisons (as appropriate) with preoperational studies, operational controls, and previous environmental surveillance reports
  - At least two legible maps that include sampling locations, keyed to a table that gives distances and directions from the centerline of one reactor. One map shall include locations near the site boundary; the second shall include more distant locations
  - Land use census results
  - Descriptions of radionuclide levels—not due to plant effluents—that would otherwise have required a special report as specified in Step 6.10.16
  - A discussion of deviations from the sampling schedule as specified by VPAP-2103
  - A discussion of analyses in which the lower limit of detection (LLD) as specified by VPAP-2103 was not achievable
  - If Interlaboratory Comparison Program analyses were not performed as required by VPAP-2103, a description of corrective actions to prevent recurrence
  - An assessment of the observed impacts of Station operation on the environment

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1. A single submittal is acceptable for both units.

- c. If the Radiological Environmental Monitoring Program was not conducted as specified in VPAP-2103, the report shall state the reasons, describe actual or planned corrective action, and actions to prevent a recurrence.
- d. Radiological Protection shall forward the draft to Licensing (Station). Licensing (Station) shall complete preparation of the report with assistance from others as required.
- e. The Manager Radiological Protection and Licensing (Station) shall review the report.
- f. The Director Nuclear Station Safety and Licensing shall approve the report.
- g. Before May 1 of the following year, Licensing (Station) shall submit the report to the NRC. [TS 6.6.B.2]

**6.24.9 Annual Radiological Effluent Release Report**

See Step 6.10.3. [TS 6.6.B.3]

**6.24.10 Offsite Dose Calculation Manual (ODCM)**

See Step 6.23.12. [TS 6.8.B.3]

**6.24.11 Major Changes to Radioactive Liquid, Gaseous, and Solid Waste Treatment Systems**

See Step 6.10.3.

**6.24.12 Containment Leak Rate Test**

See Step 6.10.17.

**6.24.13 Special Reports**

- a. If the Reactor Vessel Overpressure Mitigating System is used to mitigate an RCS pressure transient:
  - 1. Licensing (Station) shall prepare a special report that describes the circumstances initiating the transient, the effect of the PORVs or the administrative controls on the transient, and any corrective action necessary to prevent recurrence.
  - 2. FSRC shall review the report.
  - 3. The Site Vice President shall approve the report.

4. Within 30 days, Licensing (Station) shall submit the report to the NRC Regional Office. [TS 6.6.C]
- b. If less than the minimum number of explosive gas monitoring instrument channels are operable for 30 days:
  1. Licensing (Station) shall prepare a special report that explains why the inoperability was not corrected in a timely manner.
  2. FSRC shall review the report.
  3. The Site Vice President shall approve the report.
  4. Within 30 days, Licensing (Station) shall submit the report to the NRC Regional Office. [TS 3.7.D.2]
- c. If the concentration of oxygen in the waste gas holdup system is greater than two percent by volume, and is not restored to less than or equal to two percent by volume within 48 hours:
  1. Licensing (Station) shall prepare a special report that describes the cause for the waste gas decay tank exceeding two percent limit, the reason the oxygen concentration could not be restored within limits, and the actions taken and time required to restore the oxygen concentration to within limits.
  2. FSRC shall review the report.
  3. The Site Vice President shall approve the report.
  4. Within 30 days, Licensing (Station) shall submit the report to the NRC Regional Office. [TS 3.11.C]
- d. Except for physics and rod exercise testing, if quadrant to average power tilt exceeds two percent for 24 hours and the design hot channel factors for rated power are not exceeded:
  1. Licensing (Station) shall prepare a special report that describes the cause of the discrepancy.
  2. FSRC shall review the report.
  3. The Site Vice President shall approve the report.

4. Within 30 days, Licensing (Station) shall submit the report to the NRC Regional Office. [TS 3.12.B.7.]

**6.24.14 Steam Generator Tube Inspection Report** [TS 6.6.A.3]

Engineering Programs - ISI/IST/Materials (Station) shall prepare a report for submittal by Licensing (Station) to the NRC within 180 days after Tavg exceeds 200°F following completion of an inspection performed in accordance with the Specification 6.4.Q, Steam Generator (SG) Program. The report shall be approved by the Site Vice President or Vice President Nuclear Engineering and shall include:

- a. The scope of inspections performed on each SG.
- b. Active degradation mechanisms found.
- c. Nondestructive examination techniques utilized for each degradation mechanism.
- d. Location, orientation (if linear), and measured sizes (if available) of service induced indications.
- e. Number of tubes plugged during the inspection outage for each active degradation mechanism.
- f. Total number and percentage of tubes plugged to date.
- g. The results of condition monitoring, including the results of tubes pulled and the in-situ testing.
- h. The effective plugging percentage for all plugging in each SG.

**6.24.15 Reactor Pressure Vessel (RPV) Head Related Inspection Results**

See Step 6.23.14.

**6.24.16 Technical Specification (TS) Bases Changes**

See Step 6.23.15. [TS 6.4.J.4]

**6.24.17 Accident Monitoring Instrumentation Report**

- a. With one required accident monitoring instrumentation channel inoperable, the inoperable channel shall be restored to operable status within 30 days or:
  1. Licensing (Station) shall prepare a report that outlines the cause of inoperability and the plans and schedule for restoring the inoperable channel to operable status.

2. FSRC shall review the report.
3. The Site Vice President shall approve the report.
4. Licensing (Station) shall submit the report to the NRC within the next 14 days.  
[TS 3.7.E.1]

- b. With two required accident monitoring instrumentation channels inoperable, an inoperable channel(s) shall be restored to operable status within 7 days or the preplanned alternate method of monitoring the appropriate function shall be initiated and:
  1. Licensing (Station) shall prepare a report that outlines the preplanned alternate method of monitoring the function, the cause of inoperability, and the plans and schedule for restoring the inoperable channel to operable status.
  2. FSRC shall review the report.
  3. The Site Vice President shall approve the report.
  4. Licensing (Station) shall submit the report to the NRC within the next 14 days.  
[TS 3.7.E.2]

#### 6.24.18 **Reactivity Anomalies**

- a. If the difference between the monthly observed and predicted steady-state boron concentrations reaches the equivalent of one percent in reactivity, an evaluation as to the cause of the discrepancy shall be made and a LER shall be submitted to the Nuclear Regulatory Commission as specified in Step 6.10.11. [TS 4.10]
- b. If the hot channel factors identified in Technical Specification 3.12 exceed their limits during periods of POWER OPERATION at greater than 10% of RATED POWER, an evaluation as to the cause of the anomaly shall be made and a LER shall be submitted to the Nuclear Regulatory Commission as specified in Step 6.10.11. [TS 4.10]

**6.25 Technical Requirements Manual (TRM)****6.25.1 Fire Protection**

If any fire protection or Appendix R functionality requirements in the TRM are not satisfied, the requirements of 10 CFR 50.72 and 10 CFR 50.73 shall be reviewed to determine if a reportable condition exists. If notification is required, refer to Steps 6.10.10 and 6.10.11 for immediate notification requirements and licensee event report system, respectively.

**6.26 Environmental Protection Plan (North Anna)****6.26.1 Reporting Related to the VPDES Permit**

- a. Nuclear Licensing and Operations Support shall submit copies to NRC of VPDES permit violation reports excluding Discharge Monitoring Reports (DMR) at the same time they are submitted to the State Department of Environmental Quality (Water). See also Step 6.27.3.n. [EPP 5.4.2]
- b. In the event:
  - Of a change or addition to the VPDES permit
  - A permit or certification appeal is stayed (entirely or in part)
  - Dominion submits proposed changes to the effective VPDES permit to the State Department of Environmental Quality (Water)
  1. The Environmental Compliance Coordinator shall prepare a notification of the event that includes a description of the event or situation and relevant supporting documentation.
  2. Nuclear Licensing and Operations Support and Electric Environmental Services shall review the notification.
  3. The Senior Vice President Nuclear Operations shall approve the notification.
  4. Within 30 days, Nuclear Licensing and Operations Support shall submit the notification to NRC. [EPP 3.2]

**6.26.2 Unusual or Important Environmental Events**

- a. If there is an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation, see Step 6.3.6.c.

- b. If a notification is made as specified in Step 6.3.6.c., Electric Environmental Services shall prepare a report that:
  - Describes, analyzes, and evaluates the event, including extent and magnitude of the impact and plant operating characteristics
  - Describes the probable cause of the event
  - Indicates the action taken to correct the reported event
  - Indicates the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems
  - Indicates the agencies notified and their preliminary responses
- c. The Environmental Compliance Coordinator shall review the report.
- d. The Site Vice President shall approve the report.
- e. Within 30 days of an occurrence of an event reported in accordance with Step 6.3.6.c., Licensing (Station) shall submit the report to NRC. [EPP 4.1 & 5.4.2]

#### **6.26.3 Environmental Operating Report**

- a. Each year, Environmental Compliance Coordinator shall prepare an environmental operating report for the previous year.
  - 1. The report shall provide summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 of the Environmental Protection Plan (EPP) for the report period.
  - 2. The report shall include:
    - A comparison with operational controls, as appropriate, and previous nonradiological environmental monitoring reports
    - An assessment of the observed impacts of Station operation on the environment
  - 3. If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the report shall include a detailed analysis of the data and proposed corrective action.



4. The report shall also include:
    - A list of EPP noncompliances and the corrective actions taken
    - A list of all changes in Station design or operation
    - A list of tests and experiments, done in accordance with EPP Subsection 3.1, that involved a potentially significant unreviewed environmental issue
    - A list of nonroutine reports submitted in accordance with Step 6.26.2.a.
  5. If some results are not available by the report due date, the report shall note and explain missing results. Missing data shall be submitted as soon as possible in a supplementary report.
- b. Electric Environmental Services shall review the report.
  - c. The Site Vice President shall approve the report.
  - d. Before May 1, Licensing (Station) shall review and submit the report to NRC.

## **6.27 State and Local Agency Regulations and Permits**

**NOTE:** The NRC must be notified if another government agency is notified. See Step 6.3.4.a.4.

### **6.27.1 State Corporation Commission**

**NOTE:** Power Supply provides estimated replacement power cost information to Regulation Services. Regulation Services submits the information to the State Corporation Commission.

#### **a. Unplanned Outages**

1. The Senior Vice President Nuclear Operations shall notify, by telephone, the State Corporation Commission Staff of unplanned outages. Notification should be within 48 hours. **[Commitment 3.2.10]**

2. For each unplanned outage, the Senior Vice President Nuclear Operations shall collect the following information:
  - Chronological sequence of events leading to the outage (a summary if a unit tripped)
  - Description of each major work item performed during the outage
  - Identification of root cause of any equipment failure or response that led to the outage, including any related company or industry experience with similar failures or responses
  - Corrective steps (if any) to avoid further or similar events
  - Outage duration and costs (for the total outage and for each major work item)
3. The Senior Vice President Nuclear Operations shall report the unplanned outage information to the State Corporation Commission by the time set by the Commission. [**Commitment 3.2.10**]

**b. Planned Outages**

1. For each planned refueling or maintenance outage, Outage & Planning shall collect and forward the following information to the Senior Vice President Nuclear Operations:
  - Planned schedule of events and duration of refueling/maintenance outage
  - Description of work performed during the outage
  - Explanation of differences between actual and planned work and outage duration
  - Duration of and costs associated with the outage
2. The Senior Vice President Nuclear Operations shall report the outage information to the State Corporation Commission by the time set by the Commission.

**c. Decommissioning Fund Status Report**

1. Site-specific decommissioning cost studies for each power station shall be revised every four years and transmitted to the NC PUC, Virginia SCC, and FERC [**Commitment 3.2.20**]. The site-specific cost estimate updates are coordinated by NL&OS and transmitted to the PUC, SCC, and FERC by the Treasury Department. See Step 6.10.13 for details as to the content and scope requirements of the site-specific cost estimates.

2. An annual update to the Decommissioning Trust Fund Status Report shall be submitted to the NC PUC, Virginia SCC, and FERC. The Status Report is to be prepared by the Treasury Department and submitted to Nuclear Licensing for review prior to transmittal by Treasury. A bi-annual update of the status of the decommissioning trust fund is submitted to the NRC by NL&OS. See Step 6.10.13.

#### **6.27.2 State Department of Emergency Management**

##### **a. Station Situations**

**NOTE:** These conditions may exceed an Emergency Action Level (EAL) as specified in EPIP-1.01, Emergency Manager Controlling Procedure. If a condition exceeds an EAL, EIPs control State and Federal agency notifications. If an event or condition does not exceed an EAL, it may still be reportable in accordance with this procedure if the event may be of media significance.

1. Immediately, and in no case later than one hour, the Shift Manager shall notify the Manager Nuclear Operations, a Director, or the Site Vice President of any event that may be of media significance. Some examples (not all inclusive) of events to be evaluated for media significance are:
  - A reactor trip (while the reactor is critical) with unusual circumstances
  - An unplanned radioactive release that is reportable in accordance with 10 CFR 50.72
  - Contamination of multiple persons from the same release at the same time. For example, contamination resulting from a radioactive material release from a piping system, a release outside of a Radiological Control Area, or other circumstances that may be of media interest.
  - A radiological overexposure that is reportable in accordance with 10 CFR 20
  - Transport of a person injured during work-related activities by ambulance to an off-site medical facility
  - Special circumstances that may be of concern to nearby residents**[Commitment 3.2.8]**
2. Within one hour, the Manager Nuclear Operations or Operations Manager On Call shall notify the Site Vice President or a Director of a potentially media significant event.

3. The Site Vice President, a Director, Manager Nuclear Operations, or Shift Manager shall notify the Senior Vice President Nuclear Operations, and the Nuclear Public Affairs Director (or Corporate Security on weekends to contact the Public Affairs Duty Officer) of a potentially media significant event.
4. Should the Nuclear Public Affairs Director or Corporate News Services on weekdays if NPA Director cannot be reached (or the Public Affairs Duty Officer on weekends) determine that either Dominion or DEM intends to issue a news release, the Nuclear Public Affairs Director or Corporate News Services on weekdays if NPA Director cannot be reached (or the Public Affairs Duty Officer on weekends) shall inform the Operations Shift Manager. The Operations Shift Manager shall make a four-hour report to NRC in accordance with Step 6.3.4.a.4. **[Commitment 3.2.16]**

**b. Emergency Plan Activation Reports**

See Steps 6.3.5.b. and 6.3.7.

**c. EWS Availability Report**

1. Each year during January, Nuclear Emergency Preparedness shall prepare a report<sup>1</sup> of Early Warning System availability for the previous year that includes:
  - Preventive maintenance (growl) test results
  - A description of failures due to spurious activations
  - Corrective maintenance (full cycle) test results
  - A summary of miscellaneous outages
  - A performance summary
2. By January 31, Nuclear Emergency Preparedness shall submit the report to DEM. **(Reference 3.1.86)**

**6.27.3 State Department of Environmental Quality (DEQ)**

**a. Smoke**

See Step 6.3.4.b.

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1. This report supplies information to support the Annual Letter of Certification the State is required to submit to FEMA in accordance with FEMA Guidance Memorandum PR-1, Policy on NUREG-0654/FEMA-REP-1 and 44 CFR 350 Periodic Requirements, October 1, 1985.

**b. Asbestos Notification and Reporting Requirements**

**NOTE:** Insulation and certain other materials at the Station may contain asbestos. If potential asbestos-containing materials have not been identified as asbestos-free, then asbestos should be assumed to be present. The proper procedures should be followed when handling, removing, and disposing asbestos-containing materials. (see the Corporate Policy and Procedures Manual)

Asbestos removals are done by contractors who are required to have the necessary training and understanding of the regulatory requirements. However, Station personnel should have knowledge of the removal process in order to ensure that the contractors follow proper handling and disposal procedures.

1. The asbestos removal contractor is responsible for notifying the Virginia Department of Labor and Industry (DLI), if the removal amount is projected to be equal to or greater than the threshold amount of 10 linear feet or 10 square feet. **This written notification must be made at least 20 days prior to any of the asbestos-containing material being disturbed.**
2. The asbestos removal contractor is responsible for notifying EPA if the removal amount is projected to be equal to or greater than the threshold amount of 260 linear feet, 160 square feet, or 35 cubic feet of regulated asbestos-containing material. **This written notification must be made to EPA at least 10 working days prior to any of the asbestos-containing material being disturbed.**
3. A copy of the letter to EPA and the asbestos notification form(s) must be maintained on-site and available for review during annual inspections. A copy of this information must also be forwarded to the Environmental Compliance Coordinator Department (EES).
4. If the amount of asbestos to be removed changes by at least twenty percent, a re-notification to the regulatory agencies would be required **10 working days before asbestos removal work begins**. If the start date is revised to a later date, re-notification is required as soon as **possible before the original start date**. The ESS must be notified promptly of any such changes.

5. At times asbestos must be removed immediately to make emergency equipment repairs or for safety purposes. A trained on-site Station representative must be present before any asbestos can be removed. The emergency renovations should be reported to the EP&C as soon as possible to allow enough time to notify the regulatory agencies. The EP&C should be contacted for assistance in identifying an emergency removal.

**c. Waste Shipment Record Requirements**

1. Prior to any shipment of asbestos a waste shipment form must be completed and forwarded to the required individuals.
2. A signed copy of the waste shipment form must be received at the Station where the asbestos was removed **no later than 35 days after the shipment was accepted for transport.**
  - If the signed copy is not received by the originating facility within the **35-day** time frame, the Station shall initiate a search to determine the status of the shipment. The EES should be notified.
  - If the copy is not received by the originating Station within a **45-day** time frame, the EES should be notified no later than noon of the 45th day. The EES will make the required notification to the regulatory agencies.

**d. Radiological Contaminated Asbestos Waste (RCAW)**

The Environmental Protection Agency - NESHAPS Coordinator for Region III approved the Dominion procedure for tracking and disposing of low level RCAW. In order to maintain compliance with NESHAPS regulations the following EPA approved procedure must be utilized.

1. The Radiological Material Control Departments at each nuclear station will begin tracking the RCAW when it leaves the Station.
2. If the signed waste shipment record (WSR) is not returned to the Station by the waste disposal site operator **within 35 days**, the Station will determine the status of the shipment and notify Dominion EP&C. If the WSR is not received **45 days after shipment**, the Station will contact the EES and written notification will be made to the Environmental Protection Agency (EPA).

3. If the shipment is sent to an interim processor for volume reduction, and, following processing, the RCAW is to be transported to the ultimate disposal site in partial shipments, the interim processor will make a sufficient number of copies of the original WSR to accompany each partial shipment to the ultimate disposal site. Each WSR copy will be given an appropriate identification number (e.g., WSR Nos. 1A, 1B, 1C, etc.) and must include information describing the portion that this partial shipment represents of the original shipment. If the volume of the waste has been altered, this information must be described in the copy sent with the partial shipment. If the original shipment of RCAW is combined with other shipments, the original WSR will accompany the entire consolidated shipment.
4. The original WSR will be sent with the final shipment of the processed RCAW. The WSR will indicate that the shipment is closed and also indicate the identification numbers and amounts of the partial shipments sent earlier. The disposal site operator will forward the WSR copies and signed original to the Station. The Station must then notify the EES so that the EPA can be notified that the outstanding WSR has been received. The Station will retain the WSRs for at least two years.
5. Copies of the above written notifications will be sent to the Nuclear Regulatory Commission concurrent with transmission of the original notifications to EPA.

**e. Pollution Control Equipment Malfunction**

1. If any pollution control equipment malfunction results in excess opacity for more than one hour, the Environmental Compliance Coordinator shall notify the Department of Environmental Quality (DEQ) as soon as practical but no later than four daytime business hours after discovery.
2. After notification is made to the DEQ, within four daytime business hours of the occurrence, the Environmental Compliance Coordinator shall notify EES of the release including all the pertinent information obtained regarding the release.

**f. Auxiliary Boiler Operation (Surry)**

1. If either of the auxiliary boilers is to be in continuous operation for more than three hours, the boiler operator shall notify EES.

2. Electric Environmental Services shall notify DEQ (Air) regional inspector, if the inspector has requested an opportunity to observe the boiler in operation.

**g. Hazardous Material Releases**

If a hazardous material is released from the Station that poses an immediate or imminent threat to public health, see Step 6.3.2.e. See also Step 6.20.9.

[Code of VA § 10.1-1429]

**h. Bypassing**

1. If an unplanned bypass occurs, see Step 6.3.6.f.
2. If the need for a bypass is known in advance, Electric Environmental Services shall notify DEQ at least ten days before the bypass. [VPDES Permit]

**i. Discharge Monitoring Report**

1. If required by DEQ, the Environmental Compliance Coordinator shall prepare a report that describes general operational data for the month.
2. By the tenth of each month, the Environmental Compliance Coordinator shall submit a monitoring report (consisting of completed, original DMR forms and any other information required from time to time by DEQ) to DEQ.

[VPDES Permit]



**j. Changes in Discharge or Management of Pollutants**

In the event of:

- Any new introduction of pollutants into treatment works or pollutant management activities which represents a significant increase in the discharge or management of pollutants which may interfere with, pass through, or otherwise be incompatible with such works or activities, if the Station was discharging or has the potential to discharge pollutants to State waters
- Any substantial change, whether permanent or temporary, in the volume or character of pollutants being introduced into treatment works, pollutant management activities, or discharge that was introducing pollutants into treatment works at the time the VPDES permit was issued
- Any reason to believe that an activity has occurred or will occur which would result in the discharge on a routine or frequent basis of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:
  - One hundred micrograms per liter
  - Two hundred micrograms per liter for acrolein and acrylonitrile
  - Five hundred micrograms per liter for 2, 4-dinitrophenol and for 1-methyl-4, 6-dinitrophenol
  - One milligram per liter for antimony
  - Five times the maximum concentration value reported for the pollutant in the permit application
  - The level established in accordance with regulation under 307(a) of the Act and accepted by the Board
- Any activity has occurred or will occur which would result in any discharge on a nonroutine or infrequent basis of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:
  - Five hundred micrograms per liter
  - One milligram per liter for antimony
  - Ten times the maximum concentration value reported for that pollutant in the permit application
  - The level established by the Board

1. Electric Environmental Services shall prepare a report that includes information on:
  - The characteristics and quantity of pollutants involved
  - Any anticipated impact of such change in the quantity and characteristics of the pollutants
  - Any additional information that may be required by DEQ
2. The Environmental Compliance Coordinator, the Director Nuclear Station Safety and Licensing, and the Plant Manager (Nuclear) shall review the report.
3. The Authorized Signatory shall approve the report.
4. Promptly, Electric Environmental Services shall submit the report to DEQ.  
[VPDES Permit]

**k. Groundwater Pumpage and Use Report (Surry)**

1. The Environmental Compliance Coordinator shall prepare a Groundwater Pumpage and Use Report each quarter.
2. The Environmental Compliance Coordinator shall submit the report to DEQ.  
**(Reference 3.1.11)**
3. Special condition 11.4 under the Groundwater Withdrawal Permit requires notice in writing to DEQ within 30 days of a major emergency that requires water withdrawals up to their pump capacity.

**l. Oil Discharge Contingency Plan (ODCP) Changes**

If significant changes occur, including:

- A change of licensee for the Station
- A substantial increase in the maximum oil storage capacity at the Station
- Decreased availability of private personnel or equipment necessary to remove, to the maximum extent practicable, the worst case release and to mitigate or prevent a substantial threat of such a release
- A change in type of product stored or handled at the Station for which an Material Safety Data Sheet (MSDS) has not been submitted

Within 30 days, Electric Environmental Services shall prepare and submit an amendment or revision to the ODCP to the DEQ Office of Spill Response and Remediation. **(Reference 3.1.10)**

**m. Operator Requirements**

If the Station does not employ or contract at least one operator who holds a current wastewater license appropriate for the facility, or there are grounds to expect that this situation will develop:

1. Electric Environmental Services shall prepare a report that provides reasons for noncompliance and a prompt schedule for achieving compliance.
2. The Environmental Compliance Coordinator, and the Director Nuclear Station Safety and Licensing, and the Plant Manager (Nuclear) shall review the report.
3. The Authorized Signatory shall approve the report.
4. Electric Environmental Services shall submit the report to DEQ.

[VPDES Permit]

**n. VPDES Permit Noncompliance**

When any requirement of the VPDES permit is not met:

1. If the noncompliance may adversely affect State waters or may endanger public health<sup>1</sup>, see Step 6.3.2.f.
2. If the noncompliance is an unpermitted, unusual, or extraordinary discharge<sup>2</sup> that enters or could be expected to enter State waters, see Step 6.3.6.e.
3. If the noncompliance is an unplanned bypass, see Step 6.3.6.f.

---

1. Applicable regulations use, but do not define, the terms “adversely affect” and “endanger public health.” These terms must be interpreted on a case-by-case basis by individuals with aquatic ecology expertise and thorough familiarity with current regulatory agency reporting and enforcement policy. Such individuals will also determine how soon a specific event must be reported to avoid enforcement (i.e., within minutes of an event, or some longer time within the not-to-exceed 24-hour limit established by the VPDES Permit).

2. Unusual or extraordinary discharge includes, but is not limited to: a) unplanned bypasses, b) upsets, c) spillage of materials resulting directly or indirectly from processing operations or pollutant management activities, d) breakdown of processing or accessory equipment, e) failure of or taking out of service, sewage or industrial waste treatment facilities, auxiliary facilities, or pollutant management activities, or f) flooding or other acts of nature. [VPDES Permit]

4. Electric Environmental Services shall prepare a letter report that includes:
  - A description and cause of noncompliance
  - The period of noncompliance, including exact dates and times or the anticipated time when the noncompliance will cease
  - Actions taken or to be taken to reduce, eliminate, and prevent recurrence
5. The Director Electric Environmental Services shall approve the report.
6. As directed by DEQ, Electric Environmental Services shall submit the report to DEQ within five days or as an attachment to the discharge monitoring report.  
See Step 6.27.3.i. [VPDES Permit]
7. Electric Environmental Services shall send a copy of the report to Nuclear Licensing and Operations Support. (See Step 6.26.1. (**North Anna**))
8. Nuclear Licensing and Operations Support shall submit copies of VPDES permit violation reports excluding DMRs to NRC and to the NRC Regional Office at the same time they are submitted to DEQ. (**Surry**)  
[**Commitment 3.2.4**]

If Dominion submits proposed VPDES permit changes to DEQ:

9. **GO TO** Step 6.26.1.b. (**North Anna**)
10. Electric Environmental Services shall coordinate the DEQ submittal with Nuclear Licensing and Operations Support.
11. At the same time the proposed changes are submitted to DEQ, Nuclear Licensing and Operations Support shall submit a copy to NRC and to the NRC Regional Office. (**Surry**) [**Commitment 3.2.4**]

**o. VPDES Permit Changes**

If the VPDES permit is changed:

1. **GO TO** Step 6.26.1.b. (**North Anna**)
2. Electric Environmental Services shall notify Nuclear Licensing and Operations Support when DEQ approves a VPDES permit change.
3. Within 30 days after DEQ approves a VPDES permit change, Nuclear Licensing and Operations Support shall notify NRC and the NRC Regional Office. (**Surry**) [**Commitment 3.2.4**]

**p. Pump and Haul Activities (Surry)**

1. Electric Environmental Services shall prepare a report for all pump and haul activities that involve removal of tank-bottom waters from the bulk storage tanks. The report shall include:
  - The name of the responsible haul contractor
  - The date and time the haul occurred
  - The final destination and disposition of the waste
  - The quantity of waste hauled
2. By the tenth of the following month, Electric Environmental Services shall submit the report to DEQ. [VPDES Permit]

**q. Temperature Monitoring Program (North Anna)**

1. Electric Environmental Services shall prepare a Temperature Monitoring Program report annually.
2. By March 31 of each year, Electric Environmental Services shall submit the data to DEQ. [VPDES Permit]

**r. Water Withdrawals**

1. Each year, the Environmental Compliance Coordinator shall prepare a Water Withdrawals Report.
2. By January 31, the Environmental Compliance Coordinator shall submit the report for the prior year to DEQ. **(Reference 3.1.11)**

**s. Underground Oil Storage Tanks (UST)**

1. The Environmental Compliance Coordinator Department must be notified if any USTs are added, removed, modified, or closed.
2. The Environmental Compliance Coordinator Department must notify the State within thirty days of new or existing tank installations and any changes in tank usage.
3. The Environmental Compliance Coordinator Department must also notify the State within thirty days prior to closure of any UST.

**t. Above Ground Oil Storage Tanks (AST)**

1. The Environmental Compliance Coordinator Department must be notified if any ASTs are added, removed, modified, or closed.
2. The Environmental Compliance Coordinator Department must notify the State within thirty days of new or existing tank installations and any changes in tank usage.

**6.27.4 State Department of Health****a. Operation Report Meter Readings (North Anna)**

1. The Environmental Compliance Coordinator shall prepare an Operation Report Meter Readings report each month.
2. By the tenth of the following month, the Environmental Compliance Coordinator shall submit the report to the State Department of Health.
3. Additional reporting requirements for bacteriological and chemical analysis of drinking water are met by following the stations drinking water permits and by the direction of the State Department of Health.

**b. Sewage Treatment Plant Operation Report (Surry)**

By the fifteenth of the following month, the Environmental Compliance Coordinator shall submit the Sewage Treatment Plant Operation report to the State Department of Health.

**c. Waterworks Operation (Surry)**

1. By the fifteenth of the following month, the Environmental Compliance Coordinator shall submit the Waterworks Operation report to the State Department of Health.
2. Reporting requirements are met for bacteriological and chemical analysis of drinking water by following the bacteriological monitoring plan and by direction of the State Department of Health.

**6.27.5 State Department of Labor and Industry****a. See Step 6.27.3.b. (Asbestos Notification and Reporting Requirements).****b. Voluntary Protection Program (VPP) [Commitment 3.2.29]**

1. Nuclear Site Safety shall prepare an annual self-assessment.
2. By the fifteenth of February, Nuclear Site Safety shall submit the report to the State Department of Labor and Industry.

**6.28 Nuclear Insurance****6.28.1 Evaluation Reports**

If Nuclear Electric Insurance Limited (NEIL) or American Nuclear Insurers (ANI) provides Dominion with an inspection report that contains compliance recommendations:

- a. The Supervisor Nuclear Site Safety (Station) shall prepare a notification letter to the appropriate insurer to convey the Dominion response and shall ensure the letter is submitted in accordance with current insurance policy provisions.
- b. The Supervisor Nuclear Site Safety (Station) shall ensure status reports are submitted to the appropriate insurer, in accordance with current insurance policy provisions, until recommendations are closed or withdrawn.

**6.28.2 Adverse Conditions**

- a. Immediately upon notification of a potential adverse condition (see Subsection 4.4), the Supervisor Nuclear Site Safety (Station) shall confer with the Director Corporate Risk Management to determine whether the condition is reportable in accordance with current insurance policy requirements.
- b. If the condition is determined to be reportable, promptly, the Supervisor Nuclear Site Safety (Station) shall notify NEIL, by telephone or facsimile, of the adverse condition or loss.
- c. Promptly, if significant additional information related to an adverse condition is obtained, Supervisor Nuclear Site Safety (Station) shall notify NEIL, by telephone or facsimile.
- d. The appropriate Station department shall prepare a report to document the adverse condition.
- e. The Site Vice President shall approve the report and forward it to the Supervisor Nuclear Site Safety (Station).
- f. Within 30 days after discovery, the Supervisor Nuclear Site Safety (Station) shall submit the report to NEIL.

### 6.28.3 Incidents

**NOTE:** NEIL encourages related events be reported, even though they are not incidents as defined in Subsection 4.23.

- a. If an event is potentially an incident (see Subsection 4.23) or involves off-site transport of radioactive materials, the Supervisor Nuclear Site Safety (Station) shall notify the Director Corporate Risk Management.
- b. The Supervisor Nuclear Site Safety (Station) shall prepare an event report.
- c. The Supervisor Nuclear Site Safety (Station) shall confer with the Director Corporate Risk Management to determine whether the event is reportable in accordance with current insurance policy requirements.
- d. If the event is determined to be reportable to NEIL, or a determination is made to submit an information report, as soon as practicable, but within 15 business days after the event, the Supervisor Nuclear Site Safety (Station) shall submit the report to NEIL.
- e. If the event involves off-site transport or release of radioactive material, Corporate Risk Management shall determine whether the event is reportable to ANI. If determined to be reportable:
  1. Promptly, Corporate Risk Management shall notify ANI by telephone.
  2. Corporate Risk Management shall prepare a confirmatory letter to document the notification and shall ensure the letter is submitted promptly to ANI.

### 6.28.4 Fire System Impairment

If a fire system is prevented from performing its intended function, for whatever reason, and the duration of the impairment is expected to exceed 48 hours:

- a. As soon as practicable the Supervisor Nuclear Site Safety shall notify NEIL of the impairment by telephone or fax.
- b. As soon as practicable, by telephone, letter, or fax, the Supervisor Nuclear Site Safety shall notify NEIL that the impairment has been corrected.



**6.28.5 INPO Ratings and Membership****a. Suspension or Downgrading**

1. Within three days after receipt of notice that Dominion membership in INPO has been suspended or cancelled, or INPO has placed the Station in Category 5, the Site Vice President, an Director or the Director NL&OS shall notify the Director Corporate Risk Management.
2. Within five days after receipt of notice, Corporate Risk Management shall notify NEIL.

**b. Upgrading**

1. Within 30 days after receipt of notice that INPO has placed the Station in Category 1, the Site Vice President, a Director, or the Director NL&OS shall notify the Director Corporate Risk Management.
2. Corporate Risk Management shall include this information as part of its annual endorsement submittals to NEIL.

**6.28.6 License Status**

Upon receipt of notice that the NRC license to operate has been revoked or suspended, or that NRC has issued a shutdown order:

- a. The Site Vice President, an Director or the Director NL&OS shall notify the Director Corporate Risk Management.
- b. Promptly, Corporate Risk Management shall notify NEIL and ANI.

**6.29 Discretionary Reports**

Submittal letters for special reports required by this subsection shall contain the same information as LER submittal letters. Submittal letters shall omit the headings for LERs.

**6.29.1 Station Blackout Alternate AC Source**

If the Station Blackout Alternate AC Source is out of service for 14 consecutive days, the requirements of 10 CFR 50.72 and 10 CFR 50.73 will be reviewed to determine if a reportable condition exists. If notification is required, refer to Steps 6.10.10 and 6.10.11 for immediate notification requirements and licensee event report system, respectively.

**6.29.2 AMSAC**

If the ATWS Mitigation System Actuation Circuit (AMSAC) is out of service (see Attachment 7, ATWS Mitigation System Actuation Circuitry (AMSAC) Functionality) for 30 consecutive days, the requirements of 10 CFR 50.72 and 10 CFR 50.73 will be reviewed to determine if reportable condition exists. If notification is required, refer to Steps 6.10.10 and 6.10.11 for immediate notification requirements and licensee event report system, respectively.

**6.29.3 Regulatory Guide 1.97 Variables**

If instruments (not otherwise specified in Technical Specifications for post accident monitoring), that are required to measure Type A, B, or C variables specified in Regulatory Guide 1.97<sup>1</sup>, are out of service for 30 consecutive days, the requirements of 10 CFR 50.72 and 10 CFR 50.73 will be reviewed to determine if reportable condition exists. If notification is required, refer to Steps 6.10.10 and 6.10.11 for immediate notification requirements and licensee event report system, respectively.

**6.29.4 Seismic Monitoring System**

If the Seismic Monitoring System is out of service for 30 consecutive days, the requirements of 10 CFR 50.72 and 10 CFR 50.73 will be reviewed to determine if reportable condition exists. If notification is required, refer to Steps 6.10.10 and 6.10.11 for immediate notification requirements and licensee event report system, respectively.

**6.29.5 Mishaps Involving Low Level Waste (LLW) Forms**

a. If an LLW form event is identified as reportable in accordance with VPAP-2104, Radioactive Waste Process Control Program (PCP), Radiological Protection shall prepare a special report that describes, as a minimum:

- The mishap
- The cause of the mishap
- Immediate corrective actions or compensatory measures
- Corrective actions to prevent recurrence

b. FSRC shall review the report.

---

1. North Anna TRM Section TR 3.3.9, Virginia Power Technical Report No. PE-0013, North Anna Power Station Response to Regulatory Guide 1.97, and Virginia Power Technical Report No. PE-0014, Surry Power Station Response to Regulatory Guide 1.97, identify applicable RG 1.97 instruments and variable types.

- c. The Site Vice President shall approve the report.
- d. Within the next 30 days, Licensing (Station) shall submit the report to the NRC Division of Low-Level Waste Management and Decommissioning and a copy to the South Carolina Department of Health and Environmental Control.

**[Commitment 3.2.7]**

**6.29.6 Otherwise Unreportable Items of Some Safety Merit**

If a situation arises that has some safety merit, but is not required to be reported by any other part of this procedure (see also Step 6.10.1), Licensing (Station), as directed by the Site Vice President, shall write a discretionary LER. Refer to Step 6.10.11 for licensee event report system.

**6.29.7 Directive on Shift Manager's Responsibilities**

Each year, the Senior Vice President Nuclear shall reissue a Directive on Shift Managers' Responsibilities stating that the Shift Manager (or during his absence from the Control Room, a designated individual) shall be responsible for the Control Room command function and shall be the only individual that may direct the licensed activities of licensed operators. The directive shall be posted on bulletin boards for regulatory required documents.

**6.30 Consolidated Data Entry (CDE) Reporting System**

Data needed to populate INPO's - CDE Database shall be collected and reported in accordance with LI-AA-500, NRC/INPO/WANO Performance Indicator and MOR Reporting.

### 6.31 Groundwater Protection Voluntary Communication Notification and Reports

**NOTE:** VPAP-2103N Offsite Dose Calculation Manual (North Anna), and VPAP-2103S Offsite Dose Calculation Manual (Surry) contain the guidance as to whether or not a sample result or a spill or leak meets the NEI Industry Initiative on Groundwater Protection.

#### 6.31.1 Notification Protocol

- a. The Shift Manager will notify the Supervisor Licensing (Station) that the Abnormal Procedure for accidental, unplanned or uncontrolled radioactive liquid release was entered and voluntary communications may be required in accordance with the NEI Industry Initiative on Groundwater Protection for a spill, leak or groundwater sample results (either onsite or offsite)

**NOTE:** Notification to the following individuals will need to be made in a timely manner to allow required notifications to local/state/federal stakeholders.

- b. The Supervisor Licensing (Station) or designee will contact the following Dominion personnel:
  1. Site Vice President
  2. Director, Electrical Environmental Services
  3. Director, Nuclear Licensing and Operations Support (NL&OS)
  4. Director, Nuclear Protection Services & EP

**NOTE:** Notifications to the local/state/federal stakeholders are to be made by the close of the next business day.

**NOTE:** When establishing communications with the State/Local officials, the GPI Notification matrix, maintained by Nuclear Public Affairs, is followed.

**NOTE:** When communicating to the State/Local officials, be clear and precise on quantifying the actual release information as it applies to the appropriate regulatory criteria.

- c. The following individuals will contact the local/state/federal stakeholders:
  1. Site Vice President or designee will contact the County Administrator.

2. Director, Nuclear Protection Services & EP or designee will contact the Virginia Department of Health and the Virginia Department of Emergency Management.
3. Director, Electrical Environmental Services or designee will contact the Virginia Department of Environmental Quality.
4. Director NL&OS or designee will contact the NRC Region II Branch Chief, the NRC Project Managers, NEI, and ANI.
5. Supervisor Licensing (Station) or designee will contact the NRC Senior Resident Inspector.

#### 6.31.2 **Reports**

- a. A written 30-day NRC report is required for all sample results (either onsite or offsite) that exceed the REMP/ODCM reporting criterion and could potentially reach the groundwater that is or could be in the future used as a source of drinking water.
- b. It is not expected that a written 30-day report will be generated each time a subsequent sample(s) from the same “plume” identifies concentrations greater than the REMP/ODCM criterion.
- c. Licensing (Station) shall prepare a notification letter to the NRC that includes:
  - Description of the event
  - Corrective measures taken
  - Actions to prevent recurrence
  - Any environmental or public health and safety consequences
- d. The Site Vice President shall review and approve the report.
- e. A copy will be provided to local and state officials.

## **7.0 RECORDS**

**7.1** The following individual and packaged documents and copies of any related correspondence completed as a result of implementing or performing this procedure are records. They shall be transmitted to Records Management in accordance with RM-AA-101, Record Creation, Transmittal, and Retrieval. Before transmittal, the sender shall assure that:

- Each record is packaged when applicable
- QA program requirements have been fulfilled for Quality Assurance records
- Each record is legible, completely filled out, and adequately identifiable to the item or activity involved
- Each record is stamped, initialed, signed, or otherwise authenticated and dated, as required by this procedure

### **7.1.1 Individual Records**

- All reports required by this procedure, including transmittal letters, except as specifically excluded by Subsection 7.2
- Supporting logs for notifications required by this procedure

### **7.1.2 Record Packages**

None

**7.2** The following documents completed as a result of implementing this procedure are **not** Quality Assurance records and are not required to be transmitted to Records Management.

- Documentation of item postings and removal per Step 6.5.1
- Fitness for duty reports—not submitted to NRC, including information specifically prepared for inclusion in or as a basis for these reports; these documents shall be retained by the Supervisor Management Information and Planning for a minimum of three years
- Documentation of oil releases to the ground up to 25 gallons, in lieu of reporting, shall be retained by the Environmental Compliance Coordinator for a minimum of five years



## Oil or Hazardous Substance Release Report

VPAP-2802 - Attachment 1

Page 1 of 2

This report is supplemental to Plant Issue (Deviation) Number _____			Date _____																																									
1.* Shift Manager on Duty (Name) _____																																												
2.* Release Reported By (Name) _____			* Primary Phone Number _____																																									
3.* Date Release Occurred _____		*Time Release Occurred _____																																										
4.* Type, Origin, and Location of Release (Exactly) _____																																												
5.* Estimated Amount (Exact Quantity if Known) _____																																												
6.* Material Discharged (for oil spills use the codes found in the SPCC Oil Spill Report form): _____																																												
7.* Reason <input type="checkbox"/> Personnel Error <input type="checkbox"/> Other (explain) _____ <input type="checkbox"/> Equipment _____																																												
8.* Status of Release <input type="checkbox"/> Continuing <input type="checkbox"/> Other (explain) _____ <input type="checkbox"/> Stopped _____																																												
9. Dominion Personnel Notified <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;"></th> <th style="width: 15%;">Time (2400 Hours)</th> <th style="width: 15%;">Date</th> <th style="width: 25%;">By (Signature)</th> <th style="width: 30%;">Name of Individual Notified (Print)</th> </tr> </thead> <tbody> <tr> <td>Station</td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td></td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td></td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td></td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>Electric Environmental Services</td> <td>_____</td> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table>						Time (2400 Hours)	Date	By (Signature)	Name of Individual Notified (Print)	Station	_____	_____	_____	_____		_____	_____	_____	_____		_____	_____	_____	_____		_____	_____	_____	_____	Electric Environmental Services	_____	_____	_____	_____										
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11.* Did release reach navigable waters or ground? <input type="checkbox"/> Yes <input type="checkbox"/> No			12.* If No, is there a potential for release? <input type="checkbox"/> Yes <input type="checkbox"/> No																																									
13.* Was release contained? <input type="checkbox"/> Yes <input type="checkbox"/> No																																												

**Key: LEPC-Local Emergency Planning Coordinator; NaRC-National Response Center; ERC-Emergency Response Center; DEQ-Department of Environmental Quality; SPCC-Spill Prevention, Control, and Countermeasures**

\* - Information is required to be reported to the agencies listed in block 10.

*Oil or Hazardous Substance  
Release Report*

VPAP-2802 - Attachment 1

Page 2 of 2

14.* Clean Up Procedure (Explain if Known)	
<hr/> <hr/> <hr/>	
15.* Statement of Shift Manager Concerning How Release Occurred	
<hr/> <hr/> <hr/> <hr/> <hr/>	
16. Send a copy of this report within 24 hours to the Environmental Compliance Coordinator and to Electric Environmental Services. Copy sent by _____ (name required).	
17. Upon completion, send telecopy of this report to the Vice President Nuclear Operations. Telecopy initiated by _____ (name required).	
Completed By (Name)	Date
16. Send original to Manager Nuclear Operations	
Reviewed By Manager Nuclear Operations (Signature)	Date

\* - Information is required to be reported to the agencies listed in block 10.



**ATTACHMENT 2**

(Page 1 of 2)

**FERC Public Safety Database Report - Instructions**

1. **Project Number - State:** As shown.
2. **Name of Project & Name of Development:** As shown.
3. **Licensee or Exemptee:** As shown.
4. **River or Stream:** As shown.
5. **Date of Incident & Time of Incident:** Self-explanatory, however, enter unknown, if applicable.
6. **Licensee Report Dates:** Self-explanatory.
7. **Description of Incident:** Enter a brief, clear, description of the incident, including who was involved, and where and when the incident occurred. FERC considers this the most important entry.
8. **Location of Incident:** Select the one category that best describes the location of the incident. If no listed category is appropriate, describe as "Other" but do not duplicate the material in "Description of Incident."
9. **Number of people involved in incident:** Self-explanatory.
10. **Type of Activity:** Select one category that best describes the incident.
11. **Result from Incident:** Indicate if incident was a drowning or electrocution. Leave blank if neither.
12. **Preparer Signature and Phone:** Self-explanatory.

**ATTACHMENT 2**

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**FERC Public Safety Database Report****Atlanta Regional Office  
Federal Energy Regulatory Commission  
Public Safety Database**

1. Project Number-State: 6335-VA
2. Name of Project: North Anna Hydroelectric Project  
Name of Development: —
3. Licensee or Exemptee: Virginia Electric and Power Company
4. River or Stream: North Anna River
5. Date of Incident \_\_/\_\_/\_\_/ Time of Incident \_\_\_\_\_
6. Licensee Report Dates: Verbal \_\_/\_\_/\_\_ Written \_\_/\_\_/\_\_
7. Description of Incident (20 words or less): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
8. Location of Incident (check one): Reservoir or Upstream \_\_\_\_; Tailrace \_\_\_\_; Intake \_\_\_\_;  
Downstream \_\_\_\_; Canal \_\_\_\_; Conduit \_\_\_\_; Penstock \_\_\_\_; Powerhouse \_\_\_\_;  
Substation \_\_\_\_; Spillway or Dam \_\_\_\_; Project Land \_\_\_\_; Other (describe): \_\_\_\_\_  
\_\_\_\_\_
9. Number of people involved in incident \_\_\_\_; Injured \_\_\_\_;  
Fatalities \_\_\_\_; No injury or fatality \_\_\_\_
10. Type of Activity (check one): Boating \_\_\_\_; Injured \_\_\_\_; Auto Vehicle \_\_\_\_; Fall \_\_\_\_;  
Inspection/Maintenance \_\_\_\_; Bank Fishing \_\_\_\_; Boat Fishing \_\_\_\_; Suicide \_\_\_\_;  
Natural Causes \_\_\_\_; Homicide \_\_\_\_; Construction \_\_\_\_; Unknown \_\_\_\_; Other \_\_\_\_\_  
\_\_\_\_\_
11. Result from Incident: Drowning \_\_\_\_; Electrocutation \_\_\_\_

-----  
This Form Prepared by: \_\_\_\_\_ (Name) \_\_\_\_\_ (Date)

\_\_\_\_\_  
(Title)

Phone No. ( ) - \_\_\_\_\_

**ATTACHMENT 3**

(Page 1 of 4)

**Emergency Response Unavailability**

Systems and facilities that are part of the Station emergency response capability are **unavailable** if:

a. **Safety Parameter Display System (SPDS) (part of the PCS)**

The following define SPDS nonfunctionality conditions. Their existence for more than eight hours is considered a major loss of accident assessment (see 6.3.5.a.6.). Engineering judgement may be needed to assess the significance of losing certain equipment. (see also VPAP-2602, Safety Parameter Display System (SPDS)(Surry), VPAP-2606, Safety Parameter Display System (SPDS) (North Anna):

- System time is not updating
- Unit's mode is invalid or incorrect and cannot be corrected
- No Technical Support Center (TSC) CRT/keyboard is available
- Neither Control Room Unit CRT/keyboard is available for either Unit
- Both Local Emergency Operations Facility (LEOF) and Central Emergency Operations Facility (CEOF) SPDS data links are unavailable
- Any top-level SPDS bar is failed and the failure is not due to the associated field equipment being nonfunctional (i.e., failure is not computer related)

**ATTACHMENT 3**

(Page 2 of 4)

**Emergency Response Unavailability****b. Emergency Response Facilities (ERFs)**

**NOTE:** ERFs may be degraded, but still considered functional when the PCS is nonfunctional in one or more facilities if alternative methods to acquire and distribute plant data are available. Reportability of PCS loss is addressed in the PCS section of this attachment.

**NOTE:** ERFs may be degraded, but still considered functional when radiological monitoring or ventilation systems are nonfunctional when an ERF is activated in an emergency that does not present an immediate habitability problem. The determination would be made by the appropriate facility manager during facility activation.

**1. TSC**

- Voice (direct or indirect) communication is unavailable between the TSC and any of the following:
  - Control Room
  - LEOF
  - Operational Support Center (OSC)
  - NRC Operations Center
  - State Emergency Operations Center
  - Local Emergency Operations Centers
- Electrical service is unavailable for more than one hour

**2. LEOF**

- Voice (direct or indirect) communication is unavailable between the LEOF and any of the following:
  - TSC
  - NRC Operations Center
  - State Emergency Operations Center
  - Local Emergency Operations Centers
- Electrical service is unavailable for more than one hour

**ATTACHMENT 3**

(Page 3 of 4)

**Emergency Response Unavailability****b. Emergency Response Facilities (ERFs) (continued)****3. CEOF**

- Voice communication (direct or indirect) is unavailable between the CEOF and any of the following:
  - TSC
  - NRC Operations Center
  - State Emergency Operations Center
  - Local Emergency Operations Centers
- Electrical service is unavailable for more than one hour

**c. Emergency Communications**

**NOTE:** If unavailability of emergency communications also constitutes unavailability of the TSC, LEOF, CEOF, or the OSC, only a single notification is required.

**NOTE:** If NRC Emergency Telecommunications System (ETS) functionality is provided using licensee corporate communications systems, the NRC Operations Center should be informed through any means available of any communication failures which render ETS communication functions unavailable. This does not apply to minor interruptions in portions of the site or corporate telecommunications systems. It is intended to apply to serious conditions during which the telecommunications system can no longer fulfil the communications requirements of the Emergency Plan or provide ETS functionality. [**Commitment 3.2.22**]

- The Emergency Notification System (NRC) not available
- No means exists to contact the State and risk jurisdictions (e.g., INSTA phone, EOC ringdown, commercial communications)

**d. Early Warning System**

- There is a **total** inability to actuate the system
- More than 25 percent of all sirens are unavailable
- The capability to alert a large segment of the population does not exist

**ATTACHMENT 3**

(Page 4 of 4)

**Emergency Response Unavailability**

**e. Plant Monitors**

Fewer than the minimum number of channels are operable per Technical Specification:

- (Table 3.3.3-1) for longer than 48 hours (**North Anna**)
- (Table 3.7-6) and the applicable LCOs of Technical Specification 3.7.E have been exceeded and the 12-hour action statements to Hot Shutdown have been entered (**Surry**)



*Significant Fitness for Duty Violation or  
 Programmatic Failure/  
 Drug or Alcohol Testing Errors  
 NRC 24 Hour Notification*

**Instructions**

**VPAP-2802 - Attachment 4**

**Page 1 of 1**

1. Fitness for Duty Administrator shall complete Section A and submit this form to station management.
2. Station management shall notify the NRC Operations Center within 24 hours of Event being reported.
3. Station Operations or Licensing shall complete Section B and return this form to the Fitness for Duty Administrator.
4. Fitness for Duty Administrator shall file original and distribute copies as specified on the bottom of this form.

**Section A Event Information**

1. Event	2. Event Time [ ] A.M. [ ] P.M.
3. Event Classification A [ ] Sale, use or possession of illegal drugs or consumption or presence of alcohol within the Protected Area. B [ ] Acts by a supervisor, FFD Program personnel, or licensed operator involving sale, use, or possession of a controlled substance, use of alcohol within the protected area, determination of unfitness for scheduled work due to consumption of alcohol. C [ ] Any intentional act that casts doubt on the integrity of the FFD program. D [ ] Any programmatic failure, degradation, or discovered vulnerability of the FFD program that may permit undetected drug or alcohol use or abuse by individuals within the protected area. E [ ] Drug and Alcohol Testing Errors.	
4. Event Description	

**5. Personnel Involved in Event**

Names	Job Descriptions

6. Report Prepared By (Signature)	Date	Time of Report [ ] A.M. [ ] P.M.
7. Report Approved By (Signature)	Date	Time Approved [ ] A.M. [ ] P.M.

**Section B Notification Summary**

8. Name of Individual in NRC Contacted	Date	Time NRC Contacted [ ] A.M. [ ] P.M.
9. Distribution: Fitness For Duty Program Manager; Site Vice President; Fitness For Duty Administrator for Participant File; Director Nuclear Licensing and Operations Support		

**ATTACHMENT 5**

(Page 1 of 4)

**10 CFR 50.73 Reportability Guidelines**

This Attachment provides guidance to clarify situations that may be reportable in accordance with the requirements of 10 CFR 50.73(a).

a. **10 CFR 50.73(a)(2)(i) - Shutdowns, Technical Specification Violations, 10CFR50.54(x)**

1. “Shutdown” as used in this paragraph is the time when Technical Specifications require the unit to be in the **first** LCO-required shutdown condition (e.g., Mode 3, hot standby). If a condition is corrected before the time limit for shutdown (i.e., before completion of the shutdown), the event need not be reported. A condition (e.g., a degraded mode allowed by Technical Specifications) that exists longer than permitted by Technical Specifications, discovered after the Technical Specification time limit, **is** reportable even if rectified immediately after its discovery.
2. Although failure to meet administrative requirements of Technical Specifications is a violation, an LER is not required if the violation is administrative only and does not result in operation prohibited by the Technical Specifications. Failure to obtain FSRC approval for non-intent procedure changes within 14 days (a violation of Technical Specifications) or an organizational structure change that has not yet been approved as a Technical Specifications revision are examples of situations that do not require LERs in accordance with 10 CFR 50.73(a)(2)(i)(B).

a. **10 CFR 50.73(a)(2)(ii) - Unanalyzed Conditions**

3. Engineering judgment and experience may be necessary to determine whether a condition is unanalyzed. A minor variation in individual parameters or problems involving single pieces of equipment are excluded (e.g., at any time, one or more safety-related components may be out of service due to testing, maintenance, or a fault that has not yet been repaired). Any trivial single failure or minor error in performing surveillance tests could produce a situation in which two or more, often unrelated, safety-related components are out of service. Technically, this is an unanalyzed condition. However, these events should be reported only if they involve functionally related components or if they significantly compromise unit safety. Small voids in systems designed to remove heat from the reactor core—that have been previously shown through analysis to be not safety significant—are **not** reportable.



**ATTACHMENT 5**

(Page 2 of 4)

**10 CFR 50.73 Reportability Guidelines****a. 10 CFR 50.73(a)(2)(ii) - Unanalyzed Conditions (continued)**

Accumulation of voids that could inhibit the ability to remove heat adequately from the reactor core, particularly under natural circulation conditions, may constitute an unanalyzed condition that **is** reportable.

**4. Situations that **are** reportable include:**

- Fuel cladding failures in the reactor or in the storage pool that exceed expected values, that are unique or widespread, or that resulted from unexpected factors and would involve a release of significant quantities of fission products
- Cracks and breaks in piping, the reactor vessel, or major components in the primary coolant circuit that have safety relevance (steam generators, reactor coolant pumps, valves)
- Significant welding or material defects in the primary coolant system
- Serious temperature or pressure transients (e.g., transients that violate Technical Specifications)
- Loss of relief or safety valve operability during test or operation (so the number of operable valves is less than required by Technical Specifications)
- Loss of containment function or integrity (e.g., containment leakage rates exceeding authorized limits, loss of containment isolation valve function during tests or operation, loss of main steam isolation valve function during test or operation, or loss of containment cooling capability)

**b. 10 CFR 50.73(a)(2)(iii) - External Threats**

5. 10 CFR 50.73(a)(2)(iii) applies only to acts of nature and external hazards (e.g., railroad tank car explosion). Acts of sabotage are addressed by 10 CFR 73.71.
6. A minor brush fire in a remote area of the site that is quickly controlled by fire fighting personnel is **not** reportable. A major forest fire, large-scale flood, or major earthquake that presents a clear threat to the Station **is** reportable. Industrial accidents near the Station that create a Station safety concern **are** reportable.

**ATTACHMENT 5**

(Page 3 of 4)

**10 CFR 50.73 Reportability Guidelines****c. 10 CFR 50.73(a)(2)(iv) - Actuations**

7. "Actuation" of multi-channel systems occurs when enough channels are actuated to cause activation of the system. Single channel actuations, whether caused by failures or otherwise, are **not** reportable if they do not complete the minimum actuation logic.
8. If planned procedure calls for a manual reactor trip, but conditions develop during the shutdown that require an automatic trip, the trip **is** reportable.
9. A preplanned sequence that implies a procedure step indicates that a specific actuation will be generated and the control room personnel are aware of its specific signal generation **before** its occurrence or indication in the control room. (See note at Step 6.3.4.a.3.)

**d. 10 CFR 50.73(a)(2)(v) and (vi) - Events That Could Have Prevented Fulfillment of a Safety Function**

10. A potentially serious human error that could have prevented fulfillment of a safety function **is** reportable even if recovery factors resulted in the error being corrected (e.g., an individual who improperly operates or maintains a component could have made the same error at functionally redundant components). The actions must affect or involve components in more than one train or channel of a safety system, and the result of the actions must be undesirable from the perspective of protecting the health and safety of the public. The components need not be functionally redundant.
11. Engineering judgment is necessary to determine whether a failure or operator action that disabled one train of a safety system could have, but did not, affect a redundant train within that ESF system. If a redundant train could have been affected, the event **is** reportable.
12. A component that fails by an apparently random mechanism **may be** reportable. A failure **is** reportable if it constitutes a condition for which there is reasonable doubt that a functionally redundant train or channel would remain operational until it completed its safety function or is repaired (e.g., if a pump in one train of an ESF system fails because of improper lubrication, and engineering judgment is that there is a reasonable belief that a functionally redundant pump in another train was also improperly lubricated and would have also failed before it completed its safety function, then the actual failure **is** reportable and the potential failure of the functionally redundant pump must be discussed in the LER).

**ATTACHMENT 5**

(Page 4 of 4)

**10 CFR 50.73 Reportability Guidelines****d. 10 CFR 50.73(a)(2)(v) and (vi) - Events That Could Have Prevented Fulfillment of a Safety Function (continued)**

13. Failure of two or more trains in safety systems that include three or more trains **is** reportable if the functional capability of the overall system was jeopardized.

14. A lost or degraded non-safety service (e.g., heating, ventilation, cooling) or input (e.g., compressed air) **is** reportable if proper fulfillment of a safety function is not or cannot be assured. Failures that affect input or services to systems with no safety function are **not** reportable.

**e. 10 CFR 50.73(a)(2)(vii) - Failure of Independent Portions of Multiple Trains/Channels**

15. An event or failure **is** reportable if it results in or involves failure of independent portions of more than one train or channel in the same or different systems that have a safety function (e.g., a cause or condition causes components in Train A and B of a single system to become inoperable, even if additional trains were still available).

16. If part of a system is removed from service to perform maintenance, and the Technical Specifications permit the resulting configuration, and the system or component is returned to service within the time limit specified in the Technical Specifications, the action is **not** reportable. A condition, identified while a train or component is out of service, that could have prevented the whole system from performing its intended function **is** reportable.

**f. 10 CFR 50.73(a)(2)(viii) - Effluent Releases**

Reports made to the NRC in accordance with Paragraph (viii) also meet the effluent release reporting requirements of 10 CFR 20.2203 (a)(3).

**g. 10 CFR 50.73(a)(2)(x) - Internal Threats**

In-plant releases **are** reportable if they require evacuation of rooms or buildings that contain systems important to safety and, as a result, the ability of operators to perform necessary safety functions is significantly hampered. Precautionary evacuations of rooms and buildings subsequently determined to have been not required are **not** reportable.

**ATTACHMENT 6**

(Page 1 of 1)

**Example DEM Summary Report****SURRY POWER STATION****SUMMARY REPORT**

Emergency Classification: Notification of Unusual Event

Initiated: September 15, 1999, 2200 hours

Terminated: September 16, 1999, 1420 hours

**EVENT**

Hurricane force winds from Hurricane Floyd projected to be onsite within 12 hours.

**DESCRIPTION OF EVENT**

A Notification of Unusual Event was declared at 2200 hours on September 15, 1999 in accordance with Emergency Plan Implementing Procedure (EPIP) 1.01, Emergency Manager Controlling Procedure; Attachment 1, Emergency Action Level Table, Tab L, Condition 8 (Hurricane force winds projected onsite within 12 hours). Notification to the Virginia Department of Emergency Management and local governments was performed in accordance with EPIP-2.01, Notification of State and Local Governments. The initial notification was started at 2206 hours. Follow-up reports were transmitted at intervals as agreed upon with the State.

Surry Power Station implemented its Hurricane Response Plan at 0900 hours on September 15, 1999. Prior to that time, actions had been implemented to prepare for forecasted high winds as directed by station procedures. Extensive reviews were performed to make sure that loose material that could be affected by high winds had been either removed or secured. Also, workers ensured that emergency power supplies were ready, if needed. Additional station personnel were directed to augment the staff for operations and recovery. The Corporate Hurricane Response Center was activated in support of the response plan. At 1906 hours on September 15, 1999, shutdown of Surry Unit 2 was initiated because utility Weather Center forecasters projected hurricane force winds would be experienced onsite on Thursday, September 16, 1999. Surry Unit 1 shutdown was initiated at 2040 hours on Wednesday, September 15, 1999.

At 2300 hours September 15, 1999, the revised forecast predicted that Hurricane Floyd would take a more easterly track and hurricane force winds were not projected onsite. Power reduction on both Units was stopped and reactor power was stabilized at reduced levels. It was decided to remain in the emergency classification and at reduced power until such time as the station was clear of the storm even though the original conditions for the emergency did not exist at that time. The storm continued to veer away from Surry throughout the night and next day. Hurricane force winds were never experienced on site.

The event was terminated at 1420 hours on September 16 and termination notifications were transmitted to the Virginia Department of Emergency Management and local jurisdictions at 1426 hours. The Hurricane Response Plan was exited at 1530 hours on September 16, 1999.

**ATTACHMENT 7**

(Page 1 of 1)

**ATWS Mitigation System Actuation Circuitry (AMSAC) Functionality****1. Surry [Commitments 3.2.24 and 3.2.25]**

AMSAC cannot perform its intended function and should be considered nonfunctional when:

- The Control Room “NORMAL - BYPASS” switch is not functional
- Bypassed for maintenance (“NORMAL - BYPASS” switch is placed in “BYPASS”)
- Either turbine load input signal to AMSAC out of service
- More than one programmable logic controller is out of service
- More than one rotary output isolator is lost
- The Loop B or Loop C power supply is out of service **and** both Loop A power supplies are out of service
- The Loop B and Loop C power supplies are out of service
- Black Battery and/or AMSAC inverter are out of service
- Powered from the alternate power source

**NOTE:** One Loop A power supply can keep Loop A in service with the other Loop A supply out of service. AMSAC will be functional with a 1 out of 2 signal to trip the unit even if the Loop B or Loop C power supply is out of service.

**NOTE:** The SER (an attachment to **Reference 3.1.90**) specifies that AMSAC must function upon loss of offsite power. When the Black Battery or the AMSAC inverter is removed from service for maintenance or testing, AMSAC can be powered by using an alternate source (i.e., turbine building MCC). While powered from the MCC, AMSAC will not function as designed if there is a loss of offsite power.

**2. North Anna [Commitment 3.2.19 and 3.2.25]**

AMSAC cannot perform its intended function and should be considered nonfunctional when:

- The Control Room “NORMAL - BYPASS” switch is not functional
- Bypassed for maintenance (“NORMAL - BYPASS” switch is placed in “BYPASS”)
- Either turbine load input signal to AMSAC out of service
- More than one programmable logic controller is out of service
- More than one safety related output isolation relay is not functional
- TSC UPS and/or TSC Battery is placed out of service

**NOTE:** The SER (an attachment to **Reference 3.1.90**) specifies that AMSAC must function upon a loss of offsite power.

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**KEY ID**

(A) (B) (C) (D)

FEED IN THIS DIRECTION

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3 A B C D E  
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**ANSWER KEY INFO.**

# OF KEYS

ITEM COUNT

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2	2	4	
3	3		
4	4		
5	5		
6	6		
7	7		
8	8		
9	9		

**PERFORMANCE ASSESSMENT**

%	OF TOTAL SCORE				POINTS EARNED
	0	1	2	3	
0	0	0	0	0	
1	1	1	1	1	
2	2	2	2	2	
3	3	3	3	3	
4	4	4	4	4	
5	5	5	5	5	
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8	8	8	8	8	
9	9	9	9	9	

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Bar Code

FEED IN THIS DIRECTION

NUMBER CORRECT	
PERCENT CORRECT	
ROSTER NUMBER	
SCORE	
RESCORE	

RO



COMBINED POINTS EARNED	
COMBINED PERCENT CORRECT	
LETTER GRADE	
SCORE	
RESCORE	

SRO



**MARKING INSTRUCTIONS**

Use a No. 2 Pencil

A B C D E

Fill oval completely

A B C D E

Erase cleanly

**STUDENT ID NUMBER**

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8	8	8	8	8	8	8	8	8	8
9	9	9	9	9	9	9	9	9	9

NAME SURRY 2010-301

SUBJECT ANSWER KEY

PERIOD DATE