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

Serial No. NA3-11-026R
Docket No. 52-017
COL/DEA

DOMINION VIRGINIA POWER
NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION
SRP 14.03.10: RESPONSE TO RAI LETTER 69

On May 5, 2011, the NRC requested additional information to support the review of certain portions of the North Anna Unit 3 Combined License Application (COLA). The response to the following Request for Additional Information (RAI) is provided in Enclosure 1:

- RAI 5648 Question 14.03.10-3 ITAAC for Emergency Planning

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

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

Very truly yours,

Eugene S. Grecheck

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MRO

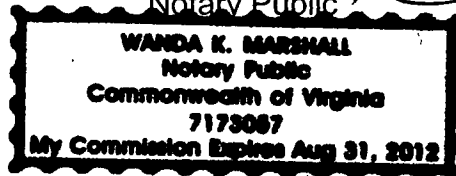
COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

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

Acknowledged before me this 9th day of June, 2011
My registration number is 7173057 and my
Commission expires: August 31, 2012

Wanda K. Marshall
Notary Public



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

Enclosure:

1. Response to NRC RAI Letter Number 69, RAI 5648 Question 14.03.10-3.

Commitments made by this letter:

1. Incorporate proposed changes in a future COLA submission.

ENCLOSURE 1

Response to NRC RAI Letter 69

RAI 5648 Question 14.03.10-3

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

North Anna Unit 3

Dominion

Docket No. 52-017

RAI NO.: 5648 (RAI Letter 69)

SRP SECTION: 14.03.10-3 – EMERGENCY PLANNING – INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

DATE OF RAI ISSUE: 05/05/2011

QUESTION NO.: 14.03.10-3

Part 10, Tier 1/ITAAC – COL application Part 10, “Tier 1/ITAAC” (Revision 3, June 2010) includes emergency planning (EP) ITAAC in Table B-1, “ITAAC for Emergency Planning.” Please address the following related questions:

- a. In ITAAC 6.2 of Table B-1, a part of the EP Program Element statement is missing from the corresponding Acceptance Criterion. Specifically, Acceptance Criterion 6.2.1 does not include or reflect the words: “and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors.” In addition, Acceptance Criterion 6.2.1 should be changed to 6.2, since it is the only acceptance criterion associated with ITAAC 6.2. Revise ITAAC 6.2, or explain why a revision is not appropriate.
- b. In ITAAC 6.3 of Table B-1, a part of the EP Program Element statement is missing from the corresponding Acceptance Criterion. Specifically, Acceptance Criterion 6.3 does not include or reflect the words: “[t]he means exist is continuously assess the impact of the release of radioactive materials to the environment.” Revise ITAAC 6.3, or explain why a revision is not appropriate.
- c. In ITAAC 6.4 of Table B-1, the bullet listing of wind speed, wind direction, and ambient air temperature in the Inspections, Tests, Analyses (ITA) column should be in the Acceptance Criteria column, because it reflects specific, objective acceptance criteria that must be met. Revise ITAAC 6.4, or explain why a revision is not appropriate.
- d. In ITAAC 6.7 of Table B-1, a part of the EP Program Element statement is missing from the corresponding Acceptance Criterion. Specifically, Acceptance

Criterion 6.7 does not include or reflect the words: "and for comparing these estimates with the EPA protective action guides (PAGs)." In addition, the listing of isotopes in the Inspections, Tests, Analyses (ITA) column should be in the Acceptance Criteria column, because it reflects specific, objective criteria that must be met. Revise ITAAC 6.7, or explain why a revision is not appropriate.

Dominion Response

The following changes will be made to address the comments in the above questions regarding emergency planning in Part 10, Tier 1/ITAAC:

- a. Acceptance Criterion 6.2.1 will be changed to 6.2 and the wording will be revised to be consistent with the EP Program Element.
- b. Acceptance Criterion 6.3 will be revised to be consistent with the EP Program Element.
- c. Acceptance Criterion 6.4 will be revised to be consistent with the level of detail in the Inspections, Tests, Analyses (ITA) column.

Additionally, the temperature capabilities will be corrected to agree with the Early Site Permit Site Safety Analysis Report, Rev. 9, section 2.3.3.1.3, which indicates that temperature is measured at the 10 m level and differential temperature is measured between the 10 m and 48.4 m level.

- d. Acceptance Criterion 6.7 will be revised to be consistent with the EP Program Element and the list of isotopes from the Inspections, Tests, Analyses (ITA) column.

Proposed COLA Revision

Part 10, Tier 1/ITAAC, Table B-1, will be revised as indicated in the attached markup.

Markup of North Anna COLA

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

Table B-1 ITAAC For Emergency Planning

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
6.0 Accident Assessment (continued)			
	<p>6.2 The means exist to determine the source term of releases of radioactive material within plant systems, and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors. [I.3]</p> <p>ITAAC element addressed in: COL EP II.I.3, Appendix 2</p>	6.2 An analysis of emergency plan implementing procedures will be performed.	<p>6.2 6.2.1 A report exists that confirms <u>and concludes</u> a methodology has been established to determine source term of releases of radioactive materials within plant systems, <u>and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors.</u></p>
	<p>6.3 The means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions. [I.4]</p> <p>ITAAC element addressed in: COL EP II.I.4, Appendix 2</p>	6.3 An analysis of emergency plan implementing procedures will be performed.	<p>6.3 A report exists that confirms <u>and concludes</u> a methodology has been provided to establish the relationship between effluent monitor readings and onsite and offsite exposures and contamination for various meteorological conditions <u>established to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions.</u></p>

Table B-1 ITAAC For Emergency Planning

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
6.0 Accident Assessment (continued)			
	<p>6.4 The means exist to acquire and evaluate meteorological information. [I.5]</p> <p>ITAAC element addressed in: COL EP II.I.5</p>	<p>6.4 An inspection of the control room, TSC, and EOF will be performed to verify the availability of the following meteorological data is available:</p> <ul style="list-style-type: none"> • Wind speed (at 10 m and 48.4 m) • Wind direction (at 10 m and 48.4 m) • Ambient air temperature (at 10 m and 48.4 m) • <u>Differential air temperature (between 10 m and 48.4 m)</u> 	<p>6.4 A report exists that confirms the specified meteorological data was available at the control room, TSC, and EOF. <u>The following meteorological data is available in the control room, TSC, and EOF:</u></p> <ul style="list-style-type: none"> • <u>Wind speed (at 10 m and 48.4 m)</u> • <u>Wind direction (at 10 m and 48.4 m)</u> • <u>Ambient air temperature (at 10 m)</u> • <u>Differential air temperature (between 10 m and 48.4 m)</u>

Table B-1 ITAAC For Emergency Planning

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
	<p>6.7 The means exist to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides (PAGs). [I.10]</p> <p>ITAAC element addressed in: COL EP II.I.10, Appendix 2</p>	<p>6.7 An analysis of emergency plan implementing procedures will be performed to verify that a methodology is provided to establish means for relating contamination levels and airborne radioactivity levels to dose rates and gross radioactivity measurements for the following isotopes – Kr-88, Ru-106, I-131, I-132, I-133, I-134, I-135, Te-132, Xe-133, Xe-135, Cs-134, Cs-137, Ce-144.</p>	<p>6.7 A report exists that confirms the means for relating contamination levels and airborne radioactivity levels to dose rates and gross radioactivity measurements for the specified isotopes has been established. <u>A report exists and concludes a methodology has been established for relating contamination levels and airborne radioactivity levels to dose rates and gross radioactivity measurements for the specified isotopes (Kr-88, Ru-106, I-131, I-132, I-133, I-134, I-135, Te-132, Xe-133, Xe-135, Cs-134, Cs-137, Ce-144), and for comparing the dose estimates with the EPA PAGs.</u></p>