

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

September 22, 2014

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

Serial No. 14-435
NL&OS/GDM R0
Docket Nos. 50-338/339
License Nos. NPF-4/7

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
MARCH 12, 2012 INFORMATION REQUEST
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING PHASE 2 STAFFING ASSESSMENT REPORT
RECOMMENDATION 9.3 (TAC NOS. MF4319 AND MF4320)

By letter dated May 7, 2014 (ADAMS Accession No. ML14133A011), Virginia Electric and Power Company (Dominion) submitted the Phase 2 Staffing Assessment Report for North Anna Power Station Units 1 and 2 in response to the Nuclear Regulatory Commission (NRC) March 12, 2012 Information Request. In a letter dated August 21, 2014, the NRC transmitted a request for additional information (RAI) related to the submittal. Dominion's response to the RAI is provided in the attachment.

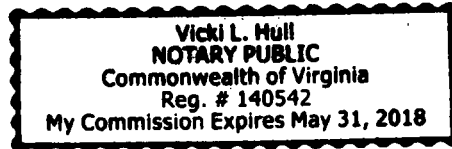
As noted in the implementation schedule provided in the May 7, 2014 letter, re-evaluation of the staffing assessment using the final approved versions of the FLEX Support Guidelines procedures and the final approved on-shift communications equipment, Dominion intends to revise and resubmit the staffing assessment report by January 30, 2015.

If you have any questions regarding this information, please contact Wanda Craft at (804) 273-4687.

Sincerely,

Dan Stoddard

Daniel G. Stoddard
Senior Vice President – Nuclear Operations
Virginia Electric and Power Company



COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Daniel G. Stoddard, who is Senior Vice President - Nuclear Operations of Virginia Electric and Power Company. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 22nd day of September, 2014.

My Commission Expires: May 31, 2018

Vicki L. Hull
Notary Public

AX45
NRC

Commitments made in this letter: None

Attachment:

Response to Request for Additional Information Regarding Phase 2 Staffing Assessment Report

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NRC Senior Resident Inspector
North Anna Power Station

ATTACHMENT

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING
PHASE 2 STAFFING ASSESSMENT REPORT**

**VIRGINIA ELECTRIC AND POWER COMPANY
(DOMINION)
NORTH ANNA POWER STATION UNITS 1 AND 2**

Response to Request for Additional Information
Phase 2 Staffing Assessment Report
North Anna Power Station Units 1 and 2

By letter dated May 7, 2014, (ADAMS Accession No. ML14133A011), Virginia Electric and Power Company (Dominion) submitted the Phase 2 Staffing Assessment Report for North Anna Power Station Units 1 and 2 in response to the Nuclear Regulatory Commission (NRC) March 12, 2012 Information Request. In a letter dated August 21, 2014, the NRC transmitted a request for additional information (RAI) related to the submittal. Dominion's response to the NRC RAI is provided below.

NRC Question 1

In your Phase 2 Staffing Assessment dated May 7, 2014, you provided information that stated the following: (1) North Anna Power Station (NAPS) current on-shift staffing may not be sufficient to perform the FLEX Support Guidelines (FSGS) identified by the station to support activities following a Beyond-Design-Basis External Event, (2) Shift personnel are not yet trained to perform FSG tasks, and (3) The qualification of on-shift auxiliary operators (AOs) requires further review to ensure their capabilities to implement the FSG strategies.

Provide an update or supplement to the Phase 2 Staffing Assessment that indicates NAPS has determined that the current on-shift staffing is capable of performing all required FSG tasks and all associated required training has been provided. Include any actions taken to correct this issue, or justification as to why no action is required.

Dominion Response

The NEI 12-01 Phase 2 Staffing Assessment that Dominion submitted to the NRC on May 7, 2014 (Serial No. 14-199, ML14133A011) contained four items that required follow-up action based on the results of the assessment (reference Attachment 2 of the May 7, 2014 letter). The four follow-up action items have been resolved and their status is provided below:

1. Initial FSG task training for site personnel has been completed and FSG task training requirements have been incorporated into the applicable departmental training programs.
2. A final NEI 12-01 Phase 2 Staffing Assessment table top exercise was conducted on August 27, 2014 using the final, approved FSGs and Emergency Operating Procedures (EOPs). The table top exercise validated that the FSG strategies could be successfully implemented using the current on-shift staff. The personnel participating in the table top exercise had previously received final training on the FSGs/EOPs.

An additional task identified subsequent to the tabletop requires a backup method for plant announcements. A Chemistry Technician has been assigned to perform this task.

3. FSG task qualification training has been provided to the Auxiliary Operators. In addition, FSG task qualification requirements have been incorporated into the operator training program.
4. Dominion intends to revise the staffing assessment report to incorporate this updated information. As previously committed in the May 7, 2014 letter, a final revision of the Dominion NEI 12-01 Phase 2 Staffing Assessment Report will be submitted to the NRC by January 30, 2015.

NRC Question 2

A review was also completed of the current security plan to identify the documented on shift security personnel (Revision 19). The following site specific information was reviewed from the North Anna staffing study submittal (P.6, 17, 18, 21, 22). These specific page numbers provided information concerning the use of security personnel during events that were described in the staffing study. The site specifically stated that, "security personnel perform both security contingency plan actions and EP tasks consisting of ERO notification and site personnel accountability. A representative of the North Anna Power Station Security department analyzed the EP tasks assigned to on-shift security individuals. It was concluded that performance of the EP tasks did not cause an overlap with their tasks related to the security plan.

The following items were noted:

- 1) Security is tasked to remove debris and to configure certain site equipment for use.*
- 2) The staffing analysis determined that these duties (i.e., FSGs) would not cause an overlap with the security tasks assigned in the site security plan.*
- 3) In accordance with Appendix C to Part 73, Section II.B.5(i), licensees shall establish and maintain written implementing procedures that provide specific guidance and operating details that identify the actions to be taken and decisions to be made by each member of the security organization who is assigned duties and responsibilities required for the effective implementation of the security plans and the site protective strategy.*

The NRC staff has reviewed your Staffing Assessment dated May 7, 2014, and requests the following information to complete its review.

- 1) *Has security received site specific training for removing [debris] and how to configure certain site equipment (e.g., equipment use, approaches to remove debris, associated procedures)? What are the main components of this training? How often is this training provided to security personnel?*

Dominion Response

Security Officers qualified as Fire Brigade Members (FBMs) (extra positions above the minimum security plan staffing requirements) have received site specific training as beyond design basis (BDB) Equipment Operators for: 1) debris removal from haul paths, and 2) staging BDB equipment. Following a Job and Task Analysis conducted by the Nuclear Training Department, a new role as BDB Equipment Operator and two new tasks were added for the Security Officers qualified as FBMs. The two new tasks are as follows:

- Deliver equipment using a tow tractor.
- Clean debris using a wheel loader.

Using the systematic approach to training, a training program has been developed and implemented to initially train and qualify the Security Officers-FBMs as BDB Equipment Operators. These Security Officers will be enrolled in a continuing training program to be retrained on these two tasks on an annual basis.

An additional task identified subsequent to the tabletop requires deployment of communications equipment. As they become available before or after debris removal, the Security Officers – FBMs are assigned to support this task. An equipment operating aid will be used for deployment of the communications equipment.

- 2) *Describe in detail how the normal on shift security personnel are allocated to provide individuals to support EP functions [while] simultaneously continuing to maintain their tasks related to the security plan. This description should address the tiered approach of the use of security personnel that is discussed in the NEI document, "Generic Basis for Responses to Staffing Assessment Questions Related to Use of Security Personnel during a BDB Response". The response to this question should be reviewed for the applicability of 10 CFR 73.21.*

Dominion Response

The Security Shift Supervisor and/or other on-shift security personnel perform Security Contingency Plan tasks and Emergency Plan (EP) tasks [i.e., Emergency Response Organization (ERO) notification and personnel accountability] during an Extended Loss of AC Power (ELAP) event. The security personnel perform the EP tasks from their assigned location which does not interfere with their assigned tasks related to the Security Plan. The EP tasks were previously validated as part of the site's review for

NEI 10-05, *Assessment of On-Shift Emergency Response Organization Staffing and Capabilities*. The validation concluded performance of EP tasks did not cause an overlap with their tasks relative to the Security Plan. In addition, Emergency Plan Implementing Procedures (EPIPs) contain guidance to perform the EP tasks, and Security personnel demonstrate effectiveness through EP training/drills and Hostile Action Based exercises.

The Security Officers – FBMs discussed in the response above are extra positions above the minimum security plan staffing requirements and do not have a required security role during an ELAP event which allows them to perform assigned FSG tasks without impacting the implementation of the Security Plan.

In NEI document, “Generic Basis for Responses to Staffing Assessment Questions Related to Use of Security Personnel during a BDB Response,” two criteria considered for the tiered approach in the use of security personnel to apply are: 1) the security personnel being used are credited in the security plan, and 2) the security personnel are performing BDB tasks. The security personnel performing the EP tasks of ERO notification and personnel accountability are not performing BDB tasks so the NEI document does not apply to these individuals. The Security Officers – FBMs who perform the BDB tasks of debris removal and equipment staging are extra security positions above the minimum security plan staffing requirements and do not have a required security role during an ELAP event; therefore, the NEI document does not apply to these individuals.

- 3) *Have site procedures been developed for how security personnel are released from supporting beyond design basis event activities which would include the priority of their dismissal? Are detailed security site procedures developed to return security to a normal posture after beyond design basis events?*

Dominion Response

Site procedures describing the release of security personnel from supporting BDB event activities for an ELAP event, which would include the priority of their dismissal, are not required to control the use of the two Security Officers – FBMs. These two individuals are in positions above the minimum security plan staffing requirements and do not have a required security role during an ELAP event.