



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 15, 2014

Mr. David A. Heacock  
President and Chief Nuclear Officer  
Dominion Nuclear Connecticut, Inc.  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNITS 2 AND 3 - RESPONSE REGARDING  
PHASE 2 STAFFING SUBMITTALS ASSOCIATED WITH NEAR-TERM TASK  
FORCE RECOMMENDATION 9.3 RELATED TO THE FUKUSHIMA DAI-ICHI  
NUCLEAR POWER PLANT ACCIDENT (TAC NOS. MF4316 AND MF4317)

Dear Mr. Heacock:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a Request for Information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.54(f) (hereafter referred to as the 50.54(f) letter), regarding Recommendations 2.1 (seismic and flooding evaluations), 2.3 (seismic and flooding walkdowns), and 9.3 (emergency preparedness communication and staffing) of the Near-Term Task Force (NTTF) review of insights from the Fukushima Dai-ichi accident. With respect to Recommendation 9.3, Enclosure 5 to the NRC's letter requested licensees to assess their means to power communications equipment onsite and offsite during an extended loss of alternating current (ac) power (ELAP) event and to perform a staffing assessment to determine the staff required to fill all necessary positions in response to a multi-unit event.

The 50.54(f) letter in part, required licensee responses pursuant to the provisions of 10 CFR 50.54(f) pertaining to onsite and augmented staff availability to implement the strategies discussed in the emergency plan and/or plant operating procedures including new staff or functions resulting from the assessment, any identified collateral duties, an implementation schedule to perform the assessments, any identified modifications, and any changes that have been made or will be made to the emergency plan regarding on-shift or augmented staffing. In addition, NTTF Recommendation 9.3 has a dependency on the implementation of NTTF Recommendation 4.2 (mitigating strategies). As a result of this dependency, licensees responded to the 50.54(f) letter in phases. The Phase 1 staffing assessment requested licensees to evaluate their ability to respond to a multi-unit ELAP event utilizing existing processes and procedures.

By letter dated April 29, 2013 (ADAMS Accession No. ML13123A012), Dominion Nuclear Connecticut, Inc. (Dominion, the licensee) submitted its Phase 1 staffing assessment, for Millstone Power Station, Units 2 and 3 (Millstone), which was received and evaluated by the NRC. The NRC staff issued an acknowledgement letter for the Phase 1 staffing submittal to licensees by letter dated October 23, 2013 (ADAMS Accession No. ML13233A183).

Licensees were also to submit for NRC staff review a Phase 2 staffing assessment which provides an assessment of the staffing necessary to perform the functions related to the strategies developed in response to NTF Recommendation 4.2 and the resulting Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A736). Licensees were requested to provide their Phase 2 Staffing Assessments to the NRC no later than four months prior to the beginning of their second refueling outage (as used in the context of NRC Order EA-12-049).

By letter dated June 12, 2014 (ADAMS Accession No. ML14168A218), Dominion submitted its Phase 2 staffing assessment for Millstone to the NRC in response to the 50.54(f) letter. By letter dated August 21, 2014 (ADAMS Accession No. ML14220A495), the NRC staff issued a request for additional information (RAI) to Dominion regarding the 10 CFR 50.54(f) Recommendation 9.3, Staffing Assessment. The RAI requested clarification regarding the minimum on-shift staffing capabilities for the performance of FLEX Support Guidelines (FSGs) and Emergency Operating Procedures (EOPs) performed in the response to a beyond-design-basis external event (BDBEE).

By letter dated September 22, 2014, (ADAMS Accession No. ML14268A245), Dominion provided a response to the RAI, which included the requested additional information and clarification. This response included the request to address the training of operators at a later date in order to comply with NRC Order EA-12-049. Condition A.2 of the order requires that licensees complete full implementation of the order no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first. By letter dated May 16, 2014 (ADAMS Accession No. ML14140A182), the licensee requested relaxation from full order implementation for Millstone Power Station, Unit 3 from the fall 2014 outage to April 30, 2015, to allow for the completion of operator training on BDBEE procedures. By letter dated July 3, 2014 (ADAMS Accession No. ML14168A007), the NRC granted the requested relaxation for full order implementation until April 30, 2015, to allow for the required operator training.

The NRC staff reviewed your Phase 2 assessment for staffing in accordance with the assumptions and guidelines of Sections 2.2, 2.3, and 3 of the Nuclear Energy Institute (NEI) guidance document NEI 12-01 "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," (ADAMS Accession No. ML12125A412), which was endorsed by the NRC staff by letter dated May 15, 2012 (ADAMS Accession No. ML12131A043). The NRC staff noted that you assessed your current onsite minimum staffing levels to identify any enhancements needed to ensure that the strategies contained in the existing emergency plan and/or plant operating procedures, such as those used in response to an ELAP, can be performed by the site staff. Your assessment assumed that a large-scale natural event causes: (1) all units on the site to be affected, (2) an ELAP, and (3) access to the site to be impeded for a minimum of six hours. You also assessed your capability to perform the site specific functions related to the strategies developed in response to NTF Recommendation 4.2 and the resulting Order EA-12-049. You conducted independent reviews and concluded, based on your staffing assessment, that the existing on-shift minimum staff is sufficient to implement the existing loss of all ac power, multi-unit event response strategies, including those strategies developed to support the requirements of NRC Order EA-12-049, while supporting performance of the required emergency planning duties without unacceptable collateral duties.

The NRC staff reviewed your Phase 2 staffing submittal and finds it acceptable, recognizing that training of the operators will be conducted at a later date. The NRC staff confirmed that your emergency response resources, as described in your emergency plan, are sufficient to perform the required plant actions and emergency plan functions, and implement the multi-unit event response strategies that were developed in response to NRC Order EA-12-049 without the assignment of collateral duties that would impact the performance of assigned emergency plan functions.

As a result, the NRC staff concludes that your Phase 2 staffing submittal adequately addresses the response strategies needed to respond to a BDBEE using your procedures and guidelines. The NRC staff will verify the implementation of your staffing capabilities, including all required training, through the inspection program.

If you have any questions regarding this letter, please contact Stephen Philpott at (301) 415-2365 or via email at [Stephen.Philpott@nrc.gov](mailto:Stephen.Philpott@nrc.gov).

Sincerely,



Carla P. Roque-Cruz, Acting Branch Chief  
Orders Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket Nos. 50-336 and 50-423

cc: Distribution via Listserv

The NRC staff reviewed your Phase 2 staffing submittal and finds it acceptable, recognizing that training of the operators will be conducted at a later date. The NRC staff confirmed that your emergency response resources, as described in your emergency plan, are sufficient to perform the required plant actions and emergency plan functions, and implement the multi-unit event response strategies that were developed in response to NRC Order EA-12-049 without the assignment of collateral duties that would impact the performance of assigned emergency plan functions.

As a result, the NRC staff concludes that your Phase 2 staffing submittal adequately addresses the response strategies needed to respond to a BDBEE using your procedures and guidelines. The NRC staff will verify the implementation of your staffing capabilities, including all required training, through the inspection program.

If you have any questions regarding this letter, please contact Stephen Philpott at (301) 415-2365 or via email at Stephen.Philpott@nrc.gov.

Sincerely,

*/RA/*

Carla P. Roque-Cruz, Acting Branch Chief  
 Orders Management Branch  
 Japan Lessons-Learned Division  
 Office of Nuclear Reactor Regulation

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