

**Attachment 1**

**Millstone Power Station Emergency Plan, Revision 56**

**10 CFR 50.54(q)(5) Summary**

**Dominion Energy Nuclear Connecticut, Inc. (DENC)**

10 CFR 50.54(q)(5) Summary of Analysis for Millstone Power Station  
Emergency Plan, Revision 56

Millstone Emergency Plan, Revision 56, incorporated the changes described below. A description of why the change was not a reduction in the effectiveness of the emergency plan and the regulatory basis for each non-editorial change is also provided.

1. Table 5-1, "Station Emergency Response Organization," has been updated to identify an MRCA in the Full Staffing column, in addition to a Manager of Radiological Consequence Assessment (MRCA) in the 60 Minute Minimum Staffing column. The assignment of this additional full staffing position enhances the ability to protect plant personnel during an emergency. The existing minimum staffing MRCA is able to meet all the requirements of the position without the assistance of the additional MRCA as demonstrated in past drills, exercises, and events. The new Full Staffing MRCA position is available to assist with administrative functions which increase during more severe events. Millstone Power Station uses all-call staffing which requires all MRCAs to respond to events when notified. Emergency planning standards 10 CFR 50.47(b)(1) (assignment of responsibility) and 10 CFR 50.47(b)(2) (onsite emergency organization), and Appendix E Section IV.A (organization) and Section IV.C (activation of emergency organization) requirements continue to be met because the emergency organization and responsibilities are described.
2. Section 6.4.4, "Personnel Radiation Dose Determination," was revised to refer to Dosimeter of Legal Record (DLR) rather than Thermoluminescent Dosimeter (TLD). The same devices are being used to measure worker dose. The name change is being made for consistency within the nuclear industry. Emergency planning standard 10 CFR 50.47(b)(8) (emergency facilities and equipment) and Appendix E Section IV.E (emergency facilities and equipment) requirements continue to be met because equipment for emergency responders is described.
3. Section 7.1, "Control Room," has been updated to reflect the current location of the Unit 1 Central Monitoring Station (CMS) Programmable Logic Controller (PLC). Some of the Unit 1 PLC system equipment was moved during a project upgrade. The PLC workstation server was moved from the Unit 1 CMS to the Unit 2 New Computer Room (access to this room requires key card entry). There is only one control station in the Unit 1 CMS which is adequate to view system parameters (monitor mode) and the Shift Manager's Control Station (control mode) remains in the Unit 2 Control Room. The alarm printer has been removed. The ability to print the alarm summary to any printer is available through each Control Station, and therefore the functional capability to print alarm summaries continues to be maintained. There is no change to any functions or abilities from either the Unit 1 CMS or the Unit 2 Control Room. Emergency planning standard 10 CFR 50.47(b)(8) and Appendix E Section IV.E requirements continue to be

- met because the description of emergency facilities and equipment reflects the current plant configuration.
4. Section 7.5, "State Emergency Operations Center," is a new section which describes the function, location, structure & habitability, and layout of the State Emergency Operations Center (SEOC). The SEOC is the multiagency coordination facility for the State of Connecticut and is located at the Connecticut State Armory in Hartford. The Joint Media Center, as described in the previous Millstone Emergency Plan (MP-EP) revision, is one of the functions located within the SEOC. In the SEOC, the Millstone Station Emergency Response Organization (SERO) advises state officials regarding plant conditions, plant response activities, protective actions, public information messaging, and state resources needed to support the response. This updated description provides a more complete description of the standards and functions of this facility. Emergency planning standard 10 CFR 50.47(b)(8) and Appendix E Section IV.E requirements continue to be met because facilities are described.
  5. Table 7-1a, "Notification of Emergency Response Organizations," was updated to number the affected communities notified and add Suffolk County, NY to the diagram. Numbering the municipalities is an administrative change. Adding Suffolk County, NY corrects an omission as this agency is described in Section 1.3, Concept of Emergency Operations, Actions, and on Figure 1-1, Emergency Response Organizations Responsibilities. There is no change in the actual notification process. Emergency planning standard 10 CFR 50.47(b)(5) (notification methods and procedures) and Appendix E Section IV.D (notification procedures) requirements continue to be met because the omission of Suffolk County NY from the list of agencies notified has been addressed.
  6. Section 8.2.2, "Additional Tests, Drills, and Exercises," has been updated to reflect the currently applicable process for conducting of fire drills. The previous MP-EP revision required that fire drills be conducted in accordance with unit Technical Requirements Manuals. However, the requirement is based on 10CFR50, Appendix R which is implemented through CM-AA-FPA-100, "Fire Protection/Appendix R (Fire Safe Shutdown) Program." In addition, the use of the corrective action program to address discrepancies identified during fire drills is now required, replacing the previous requirement for the Station Fire Marshall to review and disposition observed fire drill discrepancies. Emergency planning standard 10 CFR 50.47(b)(14) (exercises and drills) and Appendix E Section IV.F (training) requirements continue to be met because the fire drill program continues to be in place with responsibilities defined.
  7. Appendix B, "Letters of Agreement," updated the Letters of Agreement (LOAs). The services agreed to in prior LOAs did not change. LOA changes include updating the name of the Site Vice President, updating names of personnel in new positions in charge of respective agreement agencies, and for one LOA updating the cost of the services provided (agreed to via a Purchase Order). Emergency planning standard 10 CFR 50.47(b)(3) (emergency response support and resources) and Appendix E Section IV.A (organization) requirements continue

to be met because arrangements for requesting and effectively using offsite resources remain in place.

### **Editorial Changes**

Editorial changes include changes to position titles with no responsibility change, corrections in page or step numbering, reformatting changes that do not change intent purpose or order of procedural steps, corrections of typographical errors or punctuation, correction of location description, procedure title changes, and reference or annotation changes.