

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

February 21, 1995

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Serial No. 93-767A  
NL&P/PC  
Docket Nos. 50-280  
50-281  
50-338  
50-339  
License Nos. DPR-32  
DPR-37  
NPF-4  
NPF-7

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY**  
**SURRY POWER STATION UNITS 1 AND 2**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**PROPOSED EMERGENCY PLAN REVISIONS**

The purpose of this letter is to forward clarification of points raised during a November 21, 1994, conference call between the NRC staff and Virginia Electric and Power Company. The call concerned our request for approval of proposed emergency plan revisions submitted on February 18, 1994 (Serial No. 93-767). Attachment 1 provides clarification pertaining to resources which augment the response capability.

The information provided herewith reflects our current normal operations and emergency response staffing practices. Referenced staffing levels may be adjusted up or down in the future as conditions dictate in order to maintain appropriate resource levels.

Should this proposed plan revision be approved, we will revise Table 5.1 of the Surry and North Anna plans to more clearly reflect the minimum staffing requirements consistent with the provisions discussed in Attachment 1. Furthermore, we will revise both plans to clearly reflect the emergency response facility activation goals now employed internally.

Should you require further information, please contact us.

Very truly yours,



James P. O'Hanlon  
Senior Vice President - Nuclear

Attachment

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Surry Power Station

Mr. R. D. McWhorter  
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North Anna Power Station

**ATTACHMENT 1**  
**POINTS OF DISCUSSION REQUESTED TO BE CLARIFIED**

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Point No. 1. The request for plan revision needs to be clarified to demonstrate the minimum onshift staffing requirements, inclusive of personnel responsibilities.

Response. Onshift staffing requirements, as reflected in Table 5.1 of the North Anna Emergency Plan during full power operations are as follows:

<u>Normal Position</u>	<u>No.</u>	<u>Emergency Position</u>
Shift Supervisor	1	Station Emergency Manager*
Asst. Shift Supervisor	1	Asst. Shift Supervisor
Control Room Operator(RO)	3	Control Room Operator
Control Room Operator (AO)	3	Control Room Operator
Control Room Operator (AO)	1	Emergency Communicator*
HP Personnel	1	Rad. Assessment Director*
HP Personnel	1	In-plant Mon. Team Leader
HP Personnel	1	In-plant Mon. Team Member
Chemistry Personnel	1	Chemistry Team Member
Shift Technical Advisor	<u>1</u>	Shift Technical Advisor
Total	14	

Those Emergency Response Organization (ERO) position titles marked with an asterisk (\*) are transferred to personnel responding to the Technical Support Center (TSC). Upon TSC activation, the Shift Supervisor, assigned as the Station Emergency Manager (SEM) position at the onset of the event, reverts back to performing Control Room responsibilities.

In addition to the above personnel, the Fire Brigade is staffed as follows:

<u>Normal Position</u>	<u>No.</u>	<u>Emergency Position</u>
Operator	3	Fire Brigade Member**
Security	<u>2</u>	Fire Brigade Member**
Total	5	

Those ERO position titles marked with a double asterisk (\*\*) are available for other duties if the emergency event does not involve the need for the Fire Brigade.

Onshift staffing requirements pursuant to the Surry Emergency Plan during full power operation are as follows:

<u>Normal Position</u>	<u>No.</u>	<u>Emergency Position</u>
Shift Supervisor (SRO)	2	Station Emergency Manager* and Shift Supervisor
Control Room Operator(RO)	3	Control Room Operators
Control Room Operator (AO)	4	2 Control Room Operators and 2 Emergency Communicators*
HP Personnel	1	In-plant Mon. Team Leader
HP Personnel	1	In-plant Mon. Team Member
Chemistry Personnel	1	Chemistry Team Member
Shift Technical Advisor	<u>1</u>	Shift Technical Advisor
Total	13	

Those ERO position titles marked with an asterisk (\*) are transferred to personnel responding to the TSC. The person assigned the SEM position and the person assigned the Emergency Communicator position revert back to Control Room responsibilities.

The Radiological Assessment Director position, shown on Table 5.1 of the Surry plan as being covered by personnel who may be assigned other duties, is covered by the HP Shift Supervisor. Although on shift, this person is not reflected in, and is in addition to, the 13 persons shown above.

In addition to the above personnel, the Fire Brigade is staffed as follows:

<u>Normal Position</u>	<u>No.</u>	<u>Emergency Position</u>
Operator	3	Fire Brigade Member**
Security	<u>2</u>	Fire Brigade Member**
Total	5	

Those ERO position titles marked with a double asterisk (\*\*) are available for other duties if the emergency event does not involve the need for the Fire Brigade.

An approval of the proposed plan revision will result in a revision of Table 5.1 of both plans to clearly reflect the minimum staffing requirements discussed herein.

Point No. 2. The request for plan revision needs to be clarified to explicitly state the activation goal for each emergency response facility.

Response. With the exception of the Surry Local Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC), internal goals for emergency response facility activation are within about 60 minutes. The goal for the Surry Local EOF is about 90 minutes. There is no set goal limitation for the JPIC. That facility starts to function as soon as each functional area is staffed and becomes operational.

Point No. 3. The request for plan revision needs to be clarified to demonstrate the number of responders augmenting the response effort.

Response. The information provided below reflects Virginia Electric and Power Company's current emergency response organization staffing practices. Referenced staffing levels may be adjusted up or down in future as conditions dictate and in order to continue to maintain resources at levels determined to be appropriate.

The current internal minimum staffing requirements for North Anna needed to activate the referenced emergency response facilities are as follows:

- TSC Minimum Staff - 13. Full Staff - 28 or more.
- OSC Minimum Staff - 9 plus AOs. Full Staff - 13 or more.
- HP Minimum Staff - 15. Full Staff - 15 or more.
- Chemistry Minimum Staff - 3. Full Staff - 3 or more.
- LEOF Minimum Staff - 7. Full Staff - 18 or more.

During an actual event at North Anna, a second full operations shift would be called in, in addition to the above personnel.

The current internal minimum staffing requirements for Surry needed to activate the referenced emergency response facilities are as follows:

- TSC Minimum Staff - 13. Full Staff - 23 or more.
- OSC Minimum Staff - 10. Full Staff - 21 or more.

HP Minimum Staff - 15. Full Staff - 15 or more.

Chemistry Minimum Staff - 3. Full Staff - 3 or more.

LEOF Minimum Staff - 7. Full Staff - 18 or more.

During an actual event at Surry, and depending on the specifics of the event, applicable operations personnel will be called in to augment the shift in addition to that presented above.

Damage Control Team management is provided in the TSC at North Anna and in the Operational Support Center (OSC) at Surry. This results in the difference between the two stations with respect to staffing the TSC and the OSC as reflected above.

The current internal minimum staffing requirements for the Corporate Emergency Response Center (CERC) and the Joint Public Information Center needed to activate the various emergency response facilities are as follows:

CERC This facility supports a formalized headquarters support function inclusive of access to vendor and service support groups and the additional resources of the Company. Minimum Staff - 12. Full Staff - 34 or more.

JPIC This facility starts to function as soon as each functional area is staffed. Areas include (with an approximate number of staff) JPIC Management (4), News Release Generation (8), Rumor Control (20), Media Monitoring (3), Government Affairs (5), and other corporate resources (as needed).

Excluding the addition of operations personnel and the resources of the JPIC for either station, the above listed response augmentation, or facilities manning total, for North Anna is 59 minimum staff and at least 111 when fully staffed. Similarly, the augmentation, or manning total, for Surry is 60 minimum staff and at least 114 when fully staffed.

While these numbers do not reflect the addition of operations personnel, they do reflect select onshift personnel anticipated to fill emergency response functions. Within the emergency response organization charts provided in the February 18, 1994, submittal, there are several minimum staffing positions that may fall into this situation. At North Anna, the OSC chart refers to Auxiliary Operator(s) (AO). These are all AOs available onsite when the facility is activated. This includes those

onshift. Additional positions that may be staffed by onshift personnel include three (3) of the fifteen (15) Health Physics positions in the HP office, one (1) of the three (3) Chemistry personnel and the Rad. Waste Operator position in the OSC.

With respect to, and as a result of a review of the history of, the Rad. Waste Operator position, it appears that this position was established strictly in accordance with the guidance of NUREG-0654 and NUREG-0737, Supp. 1. It is not anticipated that an event at either North Anna or Surry would produce sufficient need to maintain a formalized position. These functions are now performed by operators trained on the applicable systems. As the rad. waste function may be performed by onshift personnel, the minimum staffing figure for activating the OSC may rely on the availability of shift personnel. Therefore, a person on shift may be reflected in the minimum staffing figure provided above for the OSC. Should this proposed plan revision be approved, specific reference to a formal Rad. Waste Operator position will be deleted. A deletion of this position will not result in a deletion of any required response activities or a lesser number of personnel responding during an emergency.

Although the onshift First Aid Team and the onshift Fire Team are identified on the OSC organization chart, they are not, however, included in the minimum staffing number provided above for staffing the OSC. It should be noted that Table 5.1 of both plans identifies both of these functions as being augmented by offsite local support.

All other positions are anticipated to be staffed by augmenting personnel either available from the applicable work shift (e.g., mobilization occurs during the normal work schedule) or called in.

Point No. 4. The request for plan revision needs to be clarified to demonstrate that the Fire Brigade is staffed by onshift personnel in addition to the 14 reflected in Table 5.1 of the North Anna plan and the 13 reflected in Table 5.1 of the Surry plan.

Response. See response to Point No. 1. Furthermore, the governing administrative procedure, OPAP-0001, Operations Department Responsibilities and Authorities, references the onshift Fire Brigade. With respect to the five (5) Fire Brigade members, OPAP-0001 states:

"a. 3 from Operations (1 must be a qualified scene leader) and 2 from Security, the operators are not included in the RO/AO manning



[listed]." OPAP-0001 at page 15, footnote a.

Should this proposed plan revision be approved, Virginia Power will revise Table 5.1 of both plans to clearly reflect the minimum staffing requirements including the provisions discussed herein.

Point No. 5. The request for plan revision needs to be clarified with respect to the Rad. Waste Operator function reflected on Table 5.1 of both plans.

Response. During normal operations, rad. waste treatment functions are routinely performed during the day shift. As discussed above for both stations, during a response it is anticipated that no one individual would be called in solely for the purpose of operating rad. waste systems. If this function was required, an operator, or operators, trained on the systems would be assigned to perform the function(s). This function would be performed by onshift or augmenting personnel, as needed.

Furthermore, it is anticipated that rad. waste activities would be most likely performed during the recovery phase of a response and would be considered in the associated recovery planning. If, during a response, this function was identified as requiring additional support, additional personnel resources would be called in over and above those already identified.

As stated above, it appears that the position of Rad. Waste Operator was established pursuant to the guidance of NUREG-0654 and NUREG-0737, Supp. 1, and not for an organizational need. It is not anticipated that an event at either North Anna or Surry would produce sufficient need to maintain an ERO position. These functions are now performed by operators trained on the applicable systems. Should this proposed plan revision be approved, specific reference to a formal Rad. Waste Operator position will be deleted. A deletion of this position will not result in a deletion of any required response activities or produce a decrease in the number of personnel mobilized in response to an emergency.

Point No. 6. The request for plan revision needs to be clarified with respect to the minimum staffing requirements of the Corporate Emergency Response Center (CERC) and the Joint Public Information Center (JPIC).

Response. For both stations, the CERC supports a formalized headquarters support function inclusive of access to vendor and service support groups. Twelve (12) personnel are needed to staff the CERC before this facility

can be declared activated. The CERC organization relies on a JPIC Director position and a Chief Technical Spokesperson as part of the minimum staffing requirements. Full staffing of this facility is currently identified at thirty four (34) personnel plus any resources identified as being needed at the time of the emergency response.

Other than the CERC staffing positions discussed above, the JPIC has no minimum staffing requirements, per se. The JPIC provides a location for coordinating public information from utility, State, local and Federal representatives. This facility starts to function as soon as each functional area is staffed. Areas include (with approximate number of staff) JPIC Management (4), News Release Generation (8), Rumor Control (20), Media Monitoring (3), Government Affairs (5), and other corporate resources (as needed).