Attachment

RESPONSE TO REQUEST FOR CLARIFICATION

PROPOSED CONSOLIDATED EMERGENCY OPERATIONS FACILITY LICENSE AMENDMENT REQUESTS

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

Response to Request for Clarification
Proposed Consolidated Emergency Operations Facility
License Amendment Requests

Background

By letter dated January 16, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18025B468), Virginia Electric Power Company (Dominion Energy Virginia), requested the U.S. Nuclear Regulatory Commission (NRC) to approve proposed license amendments revising the emergency plans for North Anna and Surry Power Stations (NAPS and SPS, respectively) Units 1 and 2. The proposed amendments would consolidate the NAPS and SPS local emergency operations facilities (EOFs), their common back-up central EOF, and their headquarters support organization. The NRC staff determined that additional information was necessary to enable the NRC staff to complete its detailed technical review regarding the acceptability of the proposed LAR. In an email dated May 1, 2018, the NRC transmitted a request for additional information (RAI) related to the LAR.

By letter dated June 13, 2018 (ADAMS Accession No. ML18169A224), Dominion Energy Virginia replied to the NRC staff's Request for Additional Information (RAI). The NRC staff reviewed that response and identified one item needing additional clarification. The NRC stated that it appears that Dominion is still requesting a change to allow an extension of the currently approved augmentation timing from approximately 60 minutes to 75 minutes for staffing the NAPS emergency response positions. The staff requested Dominion Energy Virginia supplement its response to RAI-4 by submitting additional justification for this change as discussed below.

NRC Request for Clarification

The NAPS Local EOF (LEOF) and Technical Support Center (TSC) are both currently activated within approximately 60 minutes. The licensee proposes to relocate the LEOFs for NAPS and SPS to a consolidated emergency operations facility, referred to as the Corporate Emergency Response Center (CERC), with a proposed staff augmentation goal of 75 minutes. As such, a period of approximately 15 minutes will now exist, which was not present before, where TSC/control room staff may have to perform EOF functions (notification, dose assessment, protective action recommendations, direction of field teams, etc.) until those functions are transferred to the CERC.

Since the application only provided an on-shift staffing analysis as justification for the extension in response time, the staff developed RAI-4 to request that further technical justification be provided for the extension in augmenting emergency response organization times, which determines the activation times of each respective facility.

NOTE: This clarification is only applicable to NAPS, since the current SPS LEOF augmentation time is at 90 minutes (with the TSC at 60 minutes), which represents a reduction in the current augmentation time for SPS.

In Section 2.1, "Emergency Response Organization and Emergency Response Facility Activation Goals," to Attachment 3 of the application, Dominion Energy Virginia stated:

> *The NAPS and SPS **on-shift staffing analyses (OSAs)** showed that, for the event sequences analyzed, on-shift responders can appropriately respond to an emergency without an augmented staff for a time of up to 90 minutes. Thus, for these event sequences, the on-shift staff can analyze the conditions and declare the appropriate emergency class within 15 minutes as required by 10 CFR 50, Appendix E, IV.C.2, notify the Commonwealth of Virginia Emergency Operations Center (EOC) and site-specific risk-jurisdiction 911 Centers, and respond to the emergency event during the proposed CERC's 75 minute augmentation goal.*

In RAI-4, the NRC staff referenced Regulatory Issue Summary (RIS) 2016-10, "License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation," which states that an on-shift staffing analysis is not an acceptable method to evaluate extensions to augmentation times.

In response to RAI-4, Dominion Energy Virginia eliminated the request for the proposed changes in Section 2.1 to Attachment 3. However, Dominion Energy Virginia retained the request for the proposed changes that reference an on-shift staffing analysis as justification in Section 2.3, "Staffing and Training," and Section 2.1, "Functions *(Staffing and activation of the facility within time frames and at emergency classification levels defined in the licensee emergency plan)*," in Attachment 1.

In issuing RAI-4, the NRC staff anticipated that additional justification would be provided in lieu of the on-shift staffing analysis to support the requested extension of the augmentation goal for the NAPS EOF by 15 minutes. The staff requests the licensee to explicitly evaluate the impact on the NAPS TSC or control room staff of performing the LEOF functions for the additional period of time until the CERC is activated.

Please provide further justification for the proposed extension in timing from 60 to 75 minutes from event declaration for each LEOF function that will be transferred to the CERC.

Dominion Energy Virginia Response:

As described in Attachment 1, Section 2.1, "Functions (*Coordination of emergency response activities with Federal, State, tribal, and local Agencies*)," of Dominion Energy Virginia's January 16, 2018 license amendment requests (LAR), the initial event notification is made from the Main Control Room (MCR) and then transitions to the Technical Support Center (TSC) for subsequent notifications. The responsibilities for

making emergency class declarations, authorizing emergency exposure, and making protective action recommendations (PAR) also transfer. Currently, the responsibilities for notifying state and local agencies, making PARs and performing dose assessments are transferred from the TSC to the local EOF or back-up central EOF, as appropriate. Following implementation of the consolidated EOF, these responsibilities will transfer from the TSC to the proposed Corporate Emergency Response Center (CERC). As indicated in Attachment 1, Section 2.1, Functions (*Management of overall licensee emergency response*), page 7 of 30, of the January 16, 2018 LAR [and elaborated upon in the June 13, 2018 response to RAI-1], if the proposed CERC becomes unavailable during an event, the respective TSC at each site will have the capability to determine PARs for the public, notify offsite agencies, and perform dose assessments, including coordination of field team activities supporting the performance of dose assessments.

The table below is based on Attachment 1, "Table 2.1-1, Responsibilities for Key Functions," page 7 of 30, of the January 16, 2018 LAR with a new second column identifying current and future TSC responsibilities prior to transfer of key functions (and if the proposed CERC becomes unavailable during an event). The table has modified headings for current LEOF and proposed CERC responsibilities after functions have been assumed (footnotes removed).

Modified Table 2.1-1 Responsibilities for Key Functions

Key Function	Current and Future TSC Responsibility Prior to Transfer of Functions	Current LEOF Responsibility After Assumption of Functions	Proposed CERC Responsibility After Assumption of Functions
Approve PARs	TSC Station Emergency Manager	LEOF Recovery Manager	Site-specific CERC Technical Support Manager
Prepare emergency messages	TSC State & Local Emergency Communicator	LEOF State & Local Emergency Communicator	Site-specific CERC State & Local Emergency Communicator
Approve emergency messages	TSC Station Emergency Manager	LEOF Recovery Manager	Site-specific CERC Technical Support Manager
Transmit emergency messages	TSC State & Local Emergency Communicator	LEOF State & Local Emergency Communicator	Site-specific CERC State & Local Emergency Communicator
Assess radiological consequences	TSC Radiological Assessment Director	LEOF Radiological Assessment Coordinator	Site-specific CERC Radiological Assessment Coordinator
Review press releases for technical accuracy	N/A	LEOF Recovery Manager	Site-specific CERC Technical Support Manager
Approve press releases	N/A	Senior headquarters support position	CERC Corporate Response Manager

Normal company protocols provide for the development of emergency press releases and implementation of corporate communication protocols for company management review when the current local EOF or back-up central EOF is not activated. These protocols will apply to the proposed CERC.

The time it takes to activate the TSC and the proposed CERC is a function of the staff mobilization time rather than their respective facility activation goals. Dominion Energy Virginia's emergency response organization augmentation staff notification process will alert the TSC and proposed CERC staffs at the same time, as it currently does for the TSC and LEOF staffs. Dominion Energy Virginia's management expectation for both TSC and EOF staffs is that response to the notification is to occur directly without delay.

The current NAPS TSC and LEOF organizations, training, procedures and practices are essentially identical to those of the current SPS TSC and LEOF. The procedures that provide instruction to the NAPS and SPS LEOF's Recovery Manager and Radiological Assessment Coordinator are common. Although both the current NAPS and SPS Emergency Plans indicate the facility activation goal for their TSCs is approximately 60 minutes, the SPS Emergency Plan provides one and one half (1 1/2) hours for the LEOF to achieve full functional operation. Notwithstanding this approximately 30-minute difference between the SPS TSC's facility activation goal and the SPS LEOF's facility activation goal, actual and drill/exercise experience indicates the SPS TSC has been fully capable of performing EOF functions (e.g., event notification, dose assessment, protective action recommendations, direction of field teams, etc.) until those functions have been transferred to the LEOF.

Therefore, in summary, in the event the CERC is not fully functional for 75 minutes vice approximately 60 minutes, the TSC will have the capability to determine PARs for the public, notify offsite agencies, and perform dose assessments, including coordination of field team activities supporting the performance of dose assessments.