

**Attachment 1**

**North Anna Power Station Emergency Plan, Revision 47**

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

**Virginia Electric and Power Company (Dominion Energy Virginia)**

10 CFR 50.54(q)(5) Summary of Analysis for North Anna Power Station (NAPS)  
Emergency Plan, Revision 47

NAPS Emergency Plan, Revision 47 incorporated the changes described below. A description of why each change was not a reduction in the effectiveness of the Emergency Plan and the regulatory basis for each non-editorial change are provided.

1. Sections 1.1, Acronyms and Abbreviations, and 7.2.2.2, Enterprise Transport Network (previously Synchronous Optical Network (SONET) Ring), and Table 7.1, ERF Communications, had the terms Automatic Ringdown and Synchronous Optical Network replaced, and their acronyms removed, due to a change in technology. The change in technology is of like quality, reliability, performance, and user interface. The effectiveness of the NAPS Emergency Plan is maintained because the requirements of Appendix E to Title 10 of the Code of Federal Regulations (CFR), Part IV.E.9, and the 10CFR50.47(b)(6) standard for emergency communications continue to be met. The offsite communication system remains in place and available for use between the facilities.
2. Sections 5.3, Augmentation of Onsite Emergency Organization, 5.3.3, Local Services Support, and 6.5, Offsite Support, and Appendix 10.1, Letters of Agreement will now have Letters of Agreement (LOAs) maintained on file separately rather than contained within an appendix. The LOAs will continue to be reviewed and maintained. A License Amendment Request (Dominion Energy Virginia Serial No.17-325, dated January 16, 2018, ADAMS Accession No. ML18025B485, supplemented by Serial Nos. 18-215, dated June 13, 2018, ADAMS Accession No. ML18169A225, and 18-312, dated September 18, 2018, ADAMS Accession No. ML18267A067) requested prior NRC approval of these revisions. The effectiveness of the NAPS Emergency Plan is maintained because this revision was made in accordance with NRC approved License Amendments Nos. 281 and 264 (ADAMS Accession No. ML19031B227) for NAPS Units 1 and 2, respectively.
3. Sections 8.2.1, Annual Review of the Emergency Plan and Emergency Plan Implementing Procedures, 8.2.3, Revision of the Emergency Plan and 8.2.4, Maintenance of Emergency Plan Implementing Procedures (previously Section 8.2.1, Review of the Emergency Plan and Emergency Plan Implementing Procedures) now have separate sections addressing annual emergency plan reviews, emergency plan revisions and maintenance of implementing procedures, replacing a single section. The Facility Safety Review Committee (FSRC) is now the approval authority for emergency plan revisions and the Manager Nuclear Emergency Preparedness the approval authority for emergency plan implementing procedure revisions. A License Amendment Request (Dominion Energy Virginia Serial No.17-325, dated January 16, 2018, ADAMS Accession No. ML18025B485,

supplemented by Serial Nos. 18-215, dated June 13, 2018, ADAMS Accession No. ML18169A225, and 18-312, dated September 18, 2018, ADAMS Accession No. ML18267A067) requested prior NRC approval of these revisions. The effectiveness of the NAPS Emergency Plan is maintained because this revision was made in accordance with the approved License Amendments Nos. 281 and 264 (ADAMS Accession No. ML19031B227) for NAPS Units 1 and 2, respectively.

4. Section 8.3.3, Emergency Response Personnel Training, process for approving training exemptions and equivalent qualifications for emergency response organization members was changed to be consistent with other training programs. License Amendment Request (Dominion Energy Virginia Serial No.17-325, dated January 16, 2018, ADAMS Accession No. ML18025B485, supplemented by Serial Nos. 18-215, dated June 13, 2018, ADAMS Accession No. ML18169A225, and 18-312, dated September 18, 2018, ADAMS Accession No. ML18267A067) requested prior NRC approval of this revision. The effectiveness of the NAPS Emergency Plan is maintained because this revision was made in accordance with the approved License Amendments Nos. 281 and 264 (ADAMS Accession No. ML19031B227) for NAPS Units 1 and 2, respectively.

Appendix 10.4, Listings of Emergency Plan Implementing Procedures (EPIPs), was updated to include new EPIP-3.11, Interface with Off-Site Incident Command. This was an editorial change because it is a reference change only.