

From: Guzman, Richard
Sent: Tuesday, November 12, 2019 4:06 PM
To: Miller, Ed
Subject: FW: RE: Planned Issuance of Millstone, North Anna, and Surry Power Stations and associated ISFSIs. License Amendment to Adopt Emergency Action Level Schemes (EPID L-2019-LLA-0003)

Ed – see comment from Jeff Semancik, CT state contact (DEEP - The Connecticut Department of Energy and Environmental Protection). I assume you will check w/the technical staff to develop a short response which will be included in the final SE. Once you've developed an appropriate reply, I can forward it to him. He's aware that projected issuance of the amendment is end of Dec 2019.

Rich

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**Rich Guzman**

Sr. PM, Division Operator Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Office: O-9C7 | Phone: (301) 415-1030  
[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)

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**From:** Semancik, Jeffrey <[Jeffrey.Semancik@ct.gov](mailto:Jeffrey.Semancik@ct.gov)>  
**Sent:** Tuesday, November 12, 2019 2:37 PM  
**To:** Guzman, Richard <[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)>  
**Cc:** Tifft, Doug <[Doug.Tifft@nrc.gov](mailto:Doug.Tifft@nrc.gov)>  
**Subject:** [External\_Sender] RE: Planned Issuance of Millstone, North Anna, and Surry Power Stations and associated ISFSIs. License Amendment to Adopt Emergency Action Level Schemes (EPID L-2019-LLA-0003)

Richard,

I only received the basis document disk from Dominion today. However, based upon my previous review I do have one substantive comment:

- DEEP notes that the proposed thresholds for EAL MPS2 MU 4.2 reflect primary and secondary coolant activity values from TS 3.4.8 which Dominion has identified are non-conservative due to errors in their analyses. Specifically, Dominion has identified that based on their analysis of the radiological consequences following a postulated Main Steam Line Break and Steam Generator Tube Rupture accident, a reduction in the TS primary and secondary coolant specific activity limits are required to meet control room dose regulatory limits. Dominion has implemented administrative limits and has requested a license amendment from the NRC (Serial 19-243 dated July 30, 2019). Since the proposed uses the existing non-conservative values, it appears that Dominion would not classify the UE when they have exceeded their compensatory administrative limits

for 48 hours even though this condition is a precursor to a more significant event and represents a potential degradation of the level of safety of the plant. DEEP believes that the EAL should reflect the proper values or other compensatory action be taken to ensure proper classification and ORO notification for this condition.

V/R,

Jeffrey Semancik  
Director, Radiation Division  
Bureau of Air Management  
Connecticut Department of Energy and Environmental Protection  
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[www.ct.gov/deep/radiation](http://www.ct.gov/deep/radiation)

*Conserving, improving and protecting our natural resources and environment;  
Ensuring a clean, affordable, reliable, and sustainable energy supply.*

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**From:** Guzman, Richard <[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)>  
**Sent:** Wednesday, November 6, 2019 10:05 AM  
**To:** Semancik, Jeffrey <[Jeffrey.Semancik@ct.gov](mailto:Jeffrey.Semancik@ct.gov)>  
**Subject:** Planned Issuance of Millstone, North Anna, and Surry Power Stations and associated ISFSIs. License Amendment to Adopt Emergency Action Level Schemes (EPID L-2019-LLA-0003)

Jeff,

The NRC staff is preparing to issue the following license amendment related to Millstone Power Station, Units 1, 2, and 3, North Anna Power Station, Units 1 and 2, and the Surry Power Station, Units 1 and 2, and their associated independent spent fuel storage installations. A brief description of the license amendment request (LAR) is provided below. Additional information can be found in the licensee's submittal which is also referenced below by ADAMS Accession number.

Please let me know if you have any comments or questions regarding this licensing action by November 13. The NRC's current projection for issuance of the amendment is by December 31, 2019.

**VIRGINIA ELECTRIC AND POWER COMPANY DOMINION ENERGY NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNITS 1, 2 AND 3 AND INDEPENDENT SPENT FUEL STORAGE  
INSTALLATION (ISFSI), NORTH ANNA POWER STATION UNITS 1 AND 2 AND ISFSI, SURRY POWER  
STATION UNITS 1 AND 2 AND ISFSI, LICENSE AMENDMENT REQUEST TO ADOPT EMERGENCY ACTION  
LEVEL (EAL) SCHEMES PURSUANT TO NEI 99-01, REV. 6 (EPID L-2019-LLA-0003)**

**Application date:**

January 4, 2019, as supplemented by letters dated August 29, 2019, and October 30, 2019 (ADAMS Accession Nos. ML19011A237, ML19249B779, and ML19309E523, respectively).

**Brief Description of LAR:**

The amendments would authorize changes to the Millstone Power Station (MPS), North Anna Power Station (NAPS), and Surry Power Station (SPS) emergency plans to incorporate new Emergency Action Level (EAL) schemes prepared using the guidelines of Nuclear Energy Institute 99-01, Revision 6, "Methodology for the Development of Emergency Action Levels for Non-Passive Reactors," November 2012.

**FR Publish Date:**

The LAR was published in the Federal Register (FR) on May 21, 2019 (84 FR 23079) <https://www.govinfo.gov/content/pkg/FR-2019-05-21/pdf/2019-10315.pdf>. To date, no comments have been received.

Thanks,

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Rich Guzman

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