



VIRGINIA ELECTRIC AND POWER COMPANY, RICHMOND, VIRGINIA 23261

January 8, 1981

Mr. Harold R. Denton, Director
Nuclear Reactor Regulation
Attn: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Serial No. 009
SP/JEE:bdw

Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. Denton:

We request that we be excluded from submitting the State of Maryland Emergency Plan as a part of the North Anna Power Station's Emergency Plan for the following reasons:

1. The North Anna 50 miles EPZ only intrudes 12 miles into Maryland and covers an area of approximately 150 square miles of that state. The area is sparsely populated, with less than 10,000 residents. The greatest concentration is near the 50 mile radius.
2. Approximately 80% of the area is forest and only 10% is devoted to agriculture, with corn and soybeans the principle crops.
3. Based upon historical meteorological data we estimate that a wind from the direction of North Anna Power Station to this area only occurs 0.5% of the year.
4. Our calculations indicate that in the event of a major release of radioactivity from the Station the expected dose at the 45 mile radius will be:
 - a. To an infant thyroid from the milk path-way 1.2 to 1.8 rad-iodine, from cow and goat milk
 - b. 0.005 rad-air dose to the skin from noble gasses.

These exposures represent the worst cases and are well within the limits of the Protective Action Guides at the 38 mile radius of the 50 mile EPZ, and will be even less in the 38 to 50 mile segment of the zone that impacts the state of Maryland.

We feel that the foregoing discussion justifies an exclusion being granted to the North Anna Emergency Plan of the requirement to include the Emergency Plan for the State of Maryland, in-as-much-as there is no significant

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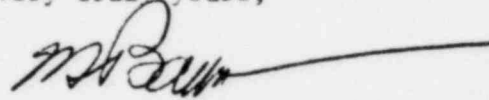
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input to the food-chain in Maryland or the population within the 50 mile EPZ from a radiological incident at North Anna Power Station.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'E. A. Baum', followed by a long horizontal flourish line extending to the right.

E. A. Baum
Executive Manager-Quality Assurance

cc: Mr. George Jones
Office of Emergency & Energy Services
Commonwealth of Virginia