



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 22, 2021

Mr. Daniel G. Stoddard
Senior Vice President and
Chief Nuclear Officer
Innsbrook Technical Center
5000 Dominion Blvd
Glen Allen, VA 23060-6711

SUBJECT: REQUESTS FOR CONFIRMATION OF INFORMATION FOR THE ENVIRONMENTAL REVIEW OF THE NORTH ANNA POWER STATION, UNITS 1 AND 2, SUBSEQUENT LICENSE RENEWAL APPLICATION (EPID NUMBER: L-2020-SLE-0000) (DOCKET NUMBERS: 50-338 AND 50-339)

Dear Mr. Stoddard:

By letters dated August 24, 2020, (Agencywide Documents Access and Management System Accession No. ML20246G703), Dominion Energy submitted an application for subsequent license renewal of Renewed Facility Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Unit Nos. 1 and 2 (North Anna) to the U.S. Nuclear Regulatory Commission (NRC) pursuant to Section 103 of the Atomic Energy Act of 1954, as amended, and part 54 of title 10 of the *Code of Federal Regulations*, "Requirements for renewal of operating licenses for nuclear power plants."

During the week of December 1, 2020, the NRC staff conducted an environmental audit of Dominion Energy's records to confirm information submitted in the North Anna license renewal application. During the audit, the staff reviewed documents that contain information which will likely be used in the Supplemental Environmental Impact Statement (SEIS). To the best of the staff's knowledge, this information is not on the docket or accessible in the public domain. Any information used to reach a conclusion in the SEIS must be included on the docket by the applicant. Therefore, we request that you submit confirmation that the information gathered during the audit and listed in the enclosure is correct or provide the associated correct information.

These requests for confirmation of information were discussed with Mr. Keith Miller of your staff, and a mutually agreeable date for the response is within 30 days from the date of this letter.

If you have any questions on this matter, please contact Mr. Tam Tran via e-mail at Tam.Tran@nrc.gov.

D. Stoddard

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Sincerely,

Tam Tran, Project Manager
Environmental Review License Renewal Branch,
Division of Rulemaking, Environment,
and Financial Support,
Office of Nuclear Material Safety
and Safeguards

Docket Nos. 50-338 AND 50-339

Enclosure: As stated

cc w/encl.: Distribution via Listserv

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***via email**

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DATE	1/11/2021	1/12 /2021	1/22/2021	1/22/2021

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NORTH ANNA POWER STATION, UNITS 1 AND 2
SUBSEQUENT LICENSE RENEWAL APPLICATION
REQUESTS FOR CONFIRMATION OF INFORMATION
ENVIRONMENTAL REVIEW

Regulatory Basis:

License renewal requirements are specified in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." Licensees are required by 10 CFR 54.23 to submit an Environmental Report (ER) that complies with the applicable requirements in 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," as part of the License Renewal Application. The Nuclear Regulatory Commission's (NRC) regulations at 10 CFR Part 51, which implement Section 102(2) of the National Environmental Policy Act (NEPA) of 1969, include requirements for applicants to provide information as may be useful in aiding the NRC staff in complying with NEPA. The NRC staff is required to prepare a site-specific Supplemental Environmental Impact Statement (SEIS) to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants." Review guidance for the staff is provided in NUREG-1555, Supplement 1, Revision 1, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants: Supplement 1 – Operating License Renewal."

Request for Confirmation of Information:

During the audit, the staff (a) reviewed several documents on the applicant electronic information portal (Agencywide Documents Access and Management System Accession No. ML20269A465), in response to the staff audit needs (ML20322A052) and (b) interviewed the applicant personnel for information that will likely be used in the SEIS. To the best of the staff's knowledge, this information is not on the docket or accessible from the public domain. The NRC staff requests that the applicant submits confirmation that the information gathered from the audit and listed below is correct or provides the associated corrected information.

Groundwater

Specific Regulatory Basis: ESRP Section 3.4 (II) and Section 4.4 (II) in accordance with 10 CFR 51.53(c)(ii)(P)

RCI-1: Based on the staff's review of the ER, groundwater sampling information in the North Anna 2020 "Radioactive Effluent Report" and, the Haley and Aldrich 2015 and 2020 reports, please confirm:

Monitoring Well PZ-3 tritium concentrations continue to remain approximately at the Minimum Detectable Activity dependent on the elevation of the water table. In the area PZ-3, leaching from historical tritium releases trapped or perched in porous vadose zone soils is likely to occur when these layers become saturated by relatively higher water table elevations.

RCI-2: Based on the staff's review of the ER, groundwater sampling information in the North Anna 2020 "Radioactive Effluent Report" and, the Haley and Aldrich 2015 and 2020 reports, please confirm:

Recent sampling confirms that there was no presence of boron in the water in the pipe tunnel water, nor was there boron in the GWP-18 well sample. Sampling for boron was conducted to rule out a pipe leak within the tunnel. Based on field investigations, there was no indication that a pipe within the pipe tunnel was leaking. Likely associated with the pipe tunnel concrete leaching tritium to the ground as there was no indication of a pipe leak, elevated GWP-18 concentration remediation activity included preventing surface and rain water from entering the pipe tunnel causing leaching of tritium from the concrete by sealing off external access points in the east-west tunnel section along the Waste Disposal building (also known as the BRT tunnel). Subsequent to removal of excess water from the pipe tunnel, GWP-18 concentrations have decreased to concentrations consistent with Lake Anna background levels. The pipe tunnel is now maintained in a dry condition due to the improvement efforts conducted during 2020 (i.e., sealing to prevent surface or rain water infiltration) minimizing any water seepage from the tunnel to groundwater.

Noise

RCI-3: Based on the review of Section 3.4 of the ER and the ER states that North Anna Power Station received one noise complaint for the five-year period from 2013-2017, please confirm:

Since 2017, NAPS has not received noise complaints.

Waste Management and Radiation Protection

RCI-4: Based on the review of Section 3.6.4.2.1 of the ER, between 2012 and 2019, there have been no inadvertent radioactive liquid releases. Please confirm:

There have not been any reportable unplanned releases of radioactive materials which would trigger a notification requirement since the ER was written.

RCI-5: Based on the review of section 3.6.4.2.2 of the ER, site records for the most recent 7 years (2013–2019), indicate there have been no inadvertent nonradioactive releases that would not be classified as an incidental spill as defined by OSHA [Office of Safety and Health Administration]. Please confirm:

There has not been any reportable inadvertent release which would trigger a notification requirement since the ER was written.

RCI-6: Based on the staff's review of Section 9.5.3.6 of the ER, North Anna is subject to the reporting provisions of Title 40 of the *Code of Federal Regulations* Part 110 as it relates to the discharge of oil in such quantities as may be harmful pursuant to Section 311(b)(4) of the Federal Water Pollution Control Act. Any discharges of oil in such quantities that may be harmful to the public health or welfare or the environment must be reported to the National Response Center. For the 7-year period of 2012-2018 there were no reportable spills. Please confirm:

There have not been any reportable spills which would trigger this notification requirement since the ER was written.

RCI-7: Based on the staff's review of Section 9.5.5.12.6 of the ER, North Anna is subject to the reporting provisions of State Water Control Law §62.1-44.34:19. This reporting provision requires that any release of regulated substance from an underground storage tank containing a petroleum product be reported to the VDEQ [Virginia Department of Environmental Quality]. The only reportable spill occurring between 2013 and 2018 was an underground fuel oil leak from the leaking 2H B fuel oil feed line which occurred in December 2016 in which the amount of fuel oil that leaked was not quantified. Please confirm:

There have not been any reportable spills which would trigger this notification requirement since the ER was written.

RCI-8: Based on the staff's review of the ER information, please confirm:

Regarding the Radiation Protection Program (overview) with emphasis on the as low as reasonably achievable (ALARA) program to control worker radiation exposure (annual dose goals and status), there are currently no proposed changes or upgrades to the program being considered during the current or subsequent license renewal term.

RCI-9: Based on the staff's review of the ER for the radioactive solid waste program information, please confirm:

Concerning how the plant plans handle low-level radioactive waste (Class A, B, and C, mixed waste, and spent nuclear fuel) during the license renewal term (onsite storage, potential expansion of storage facilities, and disposal options), there are currently no proposed changes or upgrades to the radioactive solid waste program being considered during the current or subsequent license renewal term.

RCI-10: Based on the staff's review of the ER for radioactive gaseous and liquid effluents information, please confirm:

Concerning how the plant processes radioactive effluents to maintain radiation doses to the public to levels that are ALARA, there are currently no proposed changes or upgrades to the program being considered during the current or subsequent license renewal term.

Alternatives

RCI-11: Based on the staff's review of Section E.2.6 of the ER, the stated Units 1 and 2 replacement power value (1,672 MWe) does not appear to reflect the full generation capacity of the plant. Please confirm:

The basis for the replacement power value for NAPS Units 1 and 2 presented in Section E.2.6 of the NAPS ER (1,672 MWe) is Figure 5.3.1 of Dominion's 2018 Integrated Resource Plan (ER reference Dominion 2018a). This 1,672 MWe value only reflects Dominion Energy's ownership portion of the plant's total licensed capacity of approximately 1,892 MWe, and not the approximately 11.6 percent portion under the ownership of the Old Dominion Electric Cooperative.

Surface Water

RCI-12: Based on the staff's review of the ER, please confirm:

Dominion has received no documented Notices of Violation; nonconformance notifications; or related infractions from regulatory agencies associated with permitted effluent discharges, sanitary sewage systems, groundwater or soil contamination; as well as any such notifications involving spills, leaks, and other inadvertent releases (e.g., petroleum products, chemicals, or radionuclides) since 2019.

RCI-13: Based on the staff's review of the ER, please confirm:

Concerning Commonwealth's regulations governing the issuance of water protection permits, no Virginia water protection permit is required and no new Clean Water Act §401 water quality certification is necessary for a facility's surface water withdrawals that were in existence as of July 1, 1989. Further, no Virginia water protection is required for the discharge of wastes into surface waters if the facility's discharges are otherwise subject to a Virginia Pollutant Discharge Elimination System permit, as is the case for North Anna. Accordingly, Dominion is not required to maintain, and does not possess, a separate Virginia water protection permit for operation of North Anna, Units 1 and 2.

Land Use

RC-14: Based on the staff's review of Section E3.1.4, please confirm that the following is still true:

Dominion is not pursuing developmental activities of and has made no decision to proceed with the construction of NAPS Unit 3.

Enclosure