

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

June 9, 2022

ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

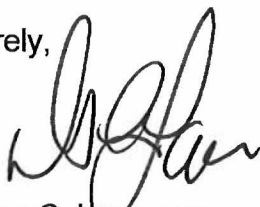
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**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION ENERGY VIRGINIA)**  
**SURRY POWER STATION UNITS 1 AND 2**  
**AND ASSOCIATED INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS**  
**REVISION TO EMERGENCY PLAN REPORT OF CHANGE**

Pursuant to 10 CFR 50.54(q)(5) and 10 CFR 72.44(f), a summary of the change analysis for Revision 7 to the Surry Power Station (SPS) Emergency Action Level (EAL) Matrix and Emergency Action Level Technical Bases (EALTB) is provided in the Attachment. Incorporated by reference, the EAL Matrix and EALTB are part of the SPS Emergency Plan. Revision 7 became effective on May 11, 2022. The revision incorporates changes that did not require prior Nuclear Regulatory Commission approval and do not implement actions that reduce the effectiveness of the SPS Emergency Plan. The Emergency Plan continues to meet the standards of 10 CFR 50.47(b) and Appendix E.

If you have any questions or require additional information, please contact Ms. Erica Combs at (804) 273-3386.

Sincerely,



Douglas C. Lawrence

Vice President – Nuclear Engineering & Fleet Support  
Virginia Electric and Power Company (Dominion Energy Virginia)

Commitments made by this letter: None.

Attachment:

Surry Power Station, Emergency Action Level Matrix and Emergency Action Level Technical Bases, Revision 7, 10 CFR 50.54 Summary

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**ATTACHMENT**

**Surry Power Station**  
**Emergency Action Level Matrix and**  
**Emergency Action Level Technical Bases**  
**Revision 7**

**10 CFR 50.54 Summary**

**Surry Power Station - Units 1 and 2**  
**Independent Spent Fuel Storage Installations**  
**Virginia Electric and Power Company**  
**(Dominion Energy Virginia)**

**10 CFR 50.54 SUMMARY:**

**SURRY POWER STATION EMERGENCY ACTION LEVEL MATRIX AND  
EMERGENCY ACTION LEVEL TECHNICAL BASIS, REVISION 7**

The current version of the Surry Power Station (SPS) Emergency Plan is Revision 71. Incorporated by reference, the Emergency Action Level (EAL) Matrix and EAL Technical Basis (EALTB) are part of the Emergency Plan. Revision 7 to the EAL Matrix and EALTB incorporated the changes described below. A summary 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. EAL Matrix, Table M-5 and Table C-6, "Communication Methods," were revised to replace references to the obsolete "Automatic Ring Down (SONET Ring)" with "Enterprise Transport Network."

The Enterprise Transport Network replaced the obsolete Automatic Ring Down (SONET Ring) communication system. Tables M-5 and C-6 were updated to reference the Enterprise Transport Network. Similar changes were made to the EALTB. This change was previously approved in Revision 67 of the SPS Emergency Plan.

Although the communication system has changed, the system continues to perform the same function for offsite communications. The change continues to meet the regulatory requirements and commitments in 10 CFR 50.47(b)(6) and (b)(4), 10 CFR Part 50 Appendix E, and NUREG-0654/FEMA-REP-1 for communications between the station and other facilities during an emergency.

The resulting changes to the EAL Matrix and EALTB do not change the existing classification scheme, decisions, or capability. Therefore, there is no reduction in the effectiveness of the EAL Matrix or EALTB.

2. EAL Matrix, EAL EU1.1, Table E-1, "ISFSI Cask Surface Dose Rate Limits," was revised to include dose rate limits for the new Extended Optimized Storage – Horizontal Storage Module (EOS-HSM) dry cask storage system approved for use at SPS.

ISFSI NRC Certificate of Compliance 1042, Amendment 1, "Technical Specifications and SER (EOS-HSM)," issued June 7, 2020, approved the use of the EOS-HSM dry cask storage system at SPS.

Dose rate limits are listed in Table E-1 for the two (2) other cask models approved for use at the SPS Independent Spent Fuel Storage Installation (ISFSI). Revision 7 added dose rate limits to Table E-1 for the new EOS-HSM cask.

The method used to determine the cask dose rate limits in Table E-1 was approved by NRC endorsed guidance NEI 99-01, Revision 6, and implemented in Revision 6 of the SPS EAL Matrix and EALTB by License Amendments No. 296 and No. 296 for SPS Units 1 and 2, respectively, on December 31, 2019. This method specifies that the threshold values correspond to two (2) times the external dose rate limits identified in the SPS ISFSI Technical Specifications (TS) and Bases. TS 5.1.2(b) contains the external dose rate limits used.

This change maintains the equivalent ability, timeliness, and criteria to determine, assess, and classify an event involving the ISFSI. All the requirements of the Emergency Plan, 10 CFR 50.47(b)(4), and 10 CFR Part 50 Appendix E continue to be met. The existing classification scheme, decisions, or capability are not changed, therefore there is no reduction in effectiveness of the EAL Matrix or EALTB.

There were no editorial changes associated with Revision 7 to the SPS EAL Matrix and EALTB.