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**ERO Facility Location and
Augmentation Response Time Changes**

Virgil C. Summer Nuclear Station

NRC Public Meeting
2/14/2023



Agenda

- Summary of Proposed Changes
- Reason for the Proposed Changes
- EOF and JIC Relocation to Corporate Emergency Response Center
- Proposed On-Shift Staffing
- Proposed Augmented Staffing
- Change Analysis
- Conclusion

Summary of Proposed Changes

- Extension of augmentation response times from 30 and 60 minutes to 60 minutes for support roles and 90 minutes for roles performing a relief function
- Extension of facility activation requirements for the Technical Support Center (TSC) and Operational Support Center (OSC) from 60 minutes to 90 minutes;
- Definition of criteria for ‘facility activation’
- Redefinition of “minimum staff” positions to align with new facility activation criteria

Summary of Proposed Changes

- Revision of On-Shift Staffing to better align with NUREG-0654, Revision 2, Table B-1
- Reduction of the Emergency Action Level (EAL) classification at which the Offsite Survey Teams are dispatched from Site Area Emergency (SAE) to Alert
- Removal of references to activities managed by processes outside of the Emergency Plan
- Relocation of administrative positions from the Emergency Plan to implementing procedures
- Replacing the Emergency Operations Facility (EOF) and Joint Information Center (JIC) with the Corporate Emergency Response Center (CERC)

Transition from Site EOF and JIC to Corporate Emergency Response Center (CERC)

- Purpose
 - Optimize use of Fleet resources in ERO
 - Focus TSC Staff on Onsite response
- The CERC will replace the Emergency Operations Facility (EOF) and Joint Information Center (JIC) for VCS in addition to performing these functions for North Anna and Surry Power Stations
 - The CERC is located at the Innsbrook Technical Center in Glen Allen, Virginia, which is >25 miles from the site.
 - The CERC has the same access to plant information as current VCS EOF as well as communications capability with applicable state/county response organizations
 - The CERC has already demonstrated the capability to successfully respond to multi-site events
 - The submittal includes a functional analysis of this change against NUREG-0696 criteria



Reason for Proposed Changes

- Better align site Emergency Plans with current regulatory guidance
- Increase the number of individuals available for immediate response to an event by extending response time requirements

Proposed On-Shift Staffing Summary

Emergency Direction and Control	Crediting only Operations personnel performing EP functions
Communication	1 position
Radiological Accident Assessment	2 positions <ul style="list-style-type: none">• In-plant/Onsite (Out-of-Plant) Surveys and Protective Actions• On-shift dose assessment
System Engineering & Technical Support	1 position (STA) <ul style="list-style-type: none">• Procedure analysis completed to assess on-shift activities for the first 90 minutes after an event IAW RIS 2016-10
Corrective Actions	Credit defense-in-depth through use of shared safety systems, Beyond Design Basis (BDB) strategies, and FLEX capabilities

Proposed Augmented Staffing Summary

Emergency Direction and Control	<ul style="list-style-type: none">• 3 positions at 90 minutes
Communication	<ul style="list-style-type: none">• 1 position at 60 minutes• 2 positions at 90 minutes
Radiological Accident Assessment	<ul style="list-style-type: none">• 1 position at 60 minutes for dose assessment• 1 Field Monitoring Team at 60 minutes• 1 Field Monitoring Team at 90 minutes• 3 RP Positions at 60 minutes and 3 at 90 minutes for In-Plant/Onsite (Out-of-Plant) Surveys and Protective Actions
Plant System Engineering	<ul style="list-style-type: none">• 3 positions at 90 minutes
Repair and Corrective Actions	<ul style="list-style-type: none">• 8 positions at 90 minutes for maintenance activities and RP oversight

Change Analysis

- Functional Analysis completed for NUREG-0654, Revision 2, Table B-1 Emergency Preparedness Functions
- Procedure Analysis assessed on-shift activities as described in site procedures for the first 90 minutes after the event
- Credit taken for shared safety systems and Beyond Design Basis / FLEX capability

References

- 1) NUREG-0654/FEMA-REP-1, Revision 2, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,” December 2019. (ADAMS Accession No. ML19347D139)
- 2) NRC Regulatory Issue Summary (RIS) 2016-10, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation,” dated August 5, 2016. (ADAMS Accession No. ML16124A002)
- 3) NUREG-0696, “Functional Criteria for Emergency Response Facilities,” February 1981. (ADAMS Accession No. ML051390358)