



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

June 22, 2023

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

SUBJECT: SURRY POWER STATION, UNITS 1 AND 2 AND NORTH ANNA POWER STATION, UNITS 1 AND 2 – AUDIT PLAN RE: LICENSE AMENDMENT REQUESTS TO CHANGE EMERGENCY PLAN STAFF AUGMENTATION TIMES (EPID L-2022-LLA-0166)

Dear Mr. Stoddard:

By letter dated November 7, 2022 (Agencywide Documents Access and Management System Accession No. ML22312A550), as supplemented by letter dated March 30, 2023 (ML23089A354), Virginia Electric and Power Company (Dominion Energy Virginia, the licensee) submitted a license amendment request (LAR) to revise the emergency plans for Surry Power Station (SPS), Units 1 and 2, and North Anna Power Station (NAPS), Units 1 and 2. Specifically, the LARs proposes to extend selected time requirements related to emergency plan staff augmentations.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined the need for a regulatory audit to be conducted in accordance with Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits" (ML19226A274), for the NRC staff to examine the licensee's non-docketed information with the intent to gain a better understanding of the LARs, verify information, and identify information that may require docketing to support the basis of the NRC staff's licensing decision.

The virtual audit will be conducted to increase the NRC staff's understanding of the propose changes and identify information that will require docketing to support the NRC staff's regulatory findings. The audit will be conducted on July 10-11, 2023. The enclosed audit plan was discussed with your staff on June 15, 2023. Any subsequent changes to logistical aspects of the audit will be coordinated with and communicated to your staff.

D. Stoddard

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If you have any questions, please contact me by telephone at (301) 415-2481 or by e-mail at [Ed.Miller@nrc.gov](mailto:Ed.Miller@nrc.gov).

Sincerely,

*/RA/*

G. Edward Miller, Project Manager  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-280, 50-281, 50-338, and 50-339

Enclosure:  
Audit Plan

cc: Listserv



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

REGULATORY AUDIT PLAN  
TO SUPPORT REVIEW OF LICENSE AMENDMENT REQUEST  
TO REVISE SURRY POWER STATION AND NORTH ANNA POWER STATION  
EMERGENCY PLAN STAFF AUGMENTATION TIMES  
DOCKET NOS. 50-280, 50-281, 50-338 AND 50-339

1. BACKGROUND

By letter dated November 7, 2022 (Agencywide Documents Access and Management System Accession No. ML22312A550), as supplemented by letter dated March 30, 2023 (ML23089A354), Virginia Electric and Power Company (Dominion Energy Virginia, the licensee) submitted a license amendment request (LAR) to revise the emergency plans for Surry Power Station (SPS), Units 1 and 2, and North Anna Power Station (NAPS), Units 1 and 2. Specifically, the LARs proposes to extend selected time requirements related to emergency plan staff augmentations.

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2. REGULATORY AUDIT BASIS

The NRC staff (i.e., audit team) will perform the audit to support its evaluation of whether the licensee's request meets the of standards of section 50.47, "Emergency plans," of Title 10 of the *Code of Federal Regulations* and the requirements of Appendix E to 10 CFR Part 50, "Emergency Planning and Preparedness for Production and Utilization Facilities."

3. REGULATORY AUDIT SCOPE AND METHODOLOGY

The audit team will review documents and references that could support the proposed changes to Emergency Response Organization (ERO) staffing.

4. INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The NRC staff requests access to the following information:

- The procedure(s) or guidance that would be used to perform the field monitoring function.
- An explanation or discussion regarding the time it would reasonably take to ensure that an unmonitored release was not occurring given the various potential release heights, release locations, and atmospheric conditions that could exist during a radiological event.
- The site-specific FLEX strategies for North Anna and Surry.
- In addition to the site-specific FLEX strategies for North Anna and Surry, provide the following:
  - An explanation identifying the various locations where on-shift staff could need to access to implement FLEX strategies.
  - A discussion that describes how radiation protection burden would be reduced or minimized during FLEX implementation.
  - Any available objective evidence, in the form of an analysis or study, that FLEX strategy is sufficiently reliable to justify the extension of maintenance support personnel emergency response organization response times.
    - This analysis should clarify Dominion's statements such as "the validation process is focused on establishing confidence in the reliability of the actions required" and "the Engineering Technical Analysis demonstrated the station's ability to execute individual FLEX strategies."
- The procedure or guidance that would be used to perform troubleshooting during normal and off-normal conditions.
  - Any supporting information that demonstrates how procedure MA-AA-103, "Conduct of Troubleshooting" does not rely on qualified individuals to perform troubleshooting. If available, include the relevant training material that ensures Dominion personnel are qualified to perform troubleshooting.

Additionally, the NRC staff requests that associated, knowledgeable licensee staff be available to answer questions regarding the above information requests and discussion.

## 5. TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff:

- Michael Norris, Team Leader, and Senior Emergency Preparedness Specialist
- Ray Hoffman, Emergency Preparedness Specialist
- Ed Miller, Project Manager

## 6. LOGISTICS

The audit will be conducted on July 10-11, 2023, at the licensee's facilities. The NRC Project Manager will coordinate any changes to the audit schedule and location with the licensee.

## 7. SPECIAL REQUESTS

The NRC staff would like access to the following equipment and services:

- Escorted or unescorted access within the protected area to germane locations of the plants;
- Enclosed conference room (or comparable space) with a table, chairs sufficient to accommodate NRC participants and supporting licensee staff;
- Access to any documentation applicable for this audit. Document format can be electronic or physical at your discretion; and
- Access to knowledgeable licensee personnel, as appropriate, to discuss staff information needs.

## 8. DELIVERABLES

An audit summary will be prepared within approximately 60 days of the completion of the audit. If the NRC staff identifies information during the audit that is needed to support its regulatory decision, the NRC staff will issue separate requests for additional information to the licensee.

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**ADAMS Accession No.: ML23152A043**

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