



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 25, 2004

Mr. J. Van Ramsdell, Jr., Staff Scientist  
Multimedia Exposure Assessment Group  
Pacific Northwest National Laboratory  
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Post Office Box 999  
Richland, WA 99352

SUBJECT: PLACEMENT OF REVISED TASK ORDER NO. 26, "REVIEW OF ENVIRONMENTAL REPORT SUBMITTED IN SUPPORT OF THE DOMINION GENERATION LICENSE RENEWAL APPLICATION FOR MILLSTONE, UNITS 2 AND 3," UNDER JCN J-2442, "TECHNICAL ASSISTANCE FOR PILOT PLANT AND OWNERS GROUP LICENSE RENEWAL ACTIVITIES AND ENVIRONMENTAL REVIEW OF APPLICATIONS"

Dear Mr. Ramsdell:

This letter transmits the revised statement of work for Task Order No. 26, which has been discussed and agreed upon between you and Barry Zalzman, of my staff, and which is in accordance with the PNNL contract proposal dated September 8, 2003, and revised task proposal dated July 28, 2004. The cost ceiling established for this task is \$43,200, which is an increase of \$5500. The new funding level established is \$30,000, which is an increase of \$5000. Funds for the task order are allocated from the funds provided under separate correspondence dated July 30, 2004. These funds will not be redirected to other task orders within this JCN without prior written authorization from the NRC.

In accordance with the procedures established in the project statement of work (NRC Form 189), please confirm your acceptance of this task order by e-mail to Ms. Sally A. Adams (saa2@nrc.gov) and by signing below and returning this letter to Ms. Adams (Mail Stop O-12 E-5) through the U.S. mail. Please call Ms. Adams if you have any comments or questions concerning the acceptance of this task order; she can be reached at (301) 415-0209. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "P. T. Kuo", is written over the typed name.

P. T. Kuo, Program Director  
License Renewal and Environmental Impacts  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Enclosure:  
Statement of Work

Accepted:

Van Ramsdell  
Project Manager, JCN-2442

Date

B/3

**ENCLOSURE**

**STATEMENT OF WORK FOR  
TASK ORDER NO. 26 UNDER JCN J-2442  
Revision 1**

**TITLE:** Review of Environmental Report Submitted in Support of the Dominion  
Generation License Renewal Application for Millstone, Units 2 and 3

**NRC Project Manager:** Sally A. Adams (301) 415-0209

**NRC Technical Monitor:** Richard L. Emch, Jr. (301) 415-1590

**TAC Numbers:** MC1827 and MC1828

**NRR Priority Number:** 1

**BACKGROUND**

On December 18, 1996, the NRC promulgated new rules for the environmental review associated with the renewal of nuclear power plant operating licenses (61 FR 66537). The rule was based on a systematic evaluation of environmental impacts associated with the renewal of a nuclear power plant license. The evaluation was documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants" (GEIS), and its Addendum 1. The NRC has updated its regulatory guidance to address radiological and non-radiological environmental issues for plants seeking license renewal. The Environmental Standard Review Plan for Environmental Reviews for Nuclear Power Plants," (ESRP) NUREG-1555, contains generic guidance for the Office of Nuclear Reactor Regulation (NRR) staff review of an application for renewed operating license for nuclear power plants.

On January 23, 2004, Dominion Generation (Dominion) applied for a renewed license under 10 CFR Part 54 for Millstone, Units 2 and 3. As part of the application, an environmental report was to be submitted as required by 10 CFR Part 51.

**OBJECTIVE**

The objective of this task order is to assist the NRC in its review of environmental protection requirements associated with the Dominion license renewal application. In addition to the NRC Project Manager, the NRC has designated an Environmental Project Manager (EPM), Mr. Richard L. Emch, Jr. The EPM for this task is also the Task Order Technical Monitor.

**TECHNICAL AND OTHER SPECIAL QUALIFICATIONS, AND KEY PERSONNEL**

The use of experienced personnel for the key positions on this task is considered essential to the success of the overall project. At a minimum, key personnel will include the PNNL Project Manager, Task Leader, and principal investigator(s) [PI(s)] overseeing or performing the actual

work (a PI and the Task Leader positions may be filled by the same individual). Key personnel cannot be changed without the approval of the Technical Monitor, which will be communicated to the contractor by the NRC Project Manager. Technical personnel shall have demonstrated expertise in the area of their responsibility on this project. PNNL will provide one technical expert with a background in Marine Ecology.

The Task Leader will have in-depth expertise in at least one of the issues covered by the ESRP, familiarity with the GEIS, familiarity with the ESRP and its intended use by the NRC, and a general understanding of the range of issues covered by the ESRP. The Task Leader will have extensive experience in the technical and regulatory aspects of evaluation the environmental impacts of the construction and/or operation of major industrial facilities that require reviews under the National Environmental Policy Act (NEPA), as, for example, nuclear power plants, and should have expertise in methods used to mitigate the impact on the environment.

It is the responsibility of the contractor to assign principal investigators, technical staff, employees, consultants, subcontractors, or specialists who have the required educational background, experience, or combination thereof to meet both technical and regulatory objectives of the work specified in this SOW.

The NRC implemented a strategy that involves a multi-discipline, multi-laboratory team as outlined in the underlying contract Statement of Work. The function of the Project Team Leader (PTL) for this project will be filled by the staff of the Los Alamos Northwest National Laboratory (LANL). The PTL and the NRC Technical Monitor will coordinate the activities of the review team. Communications issues among the PTL and all principal investigators on the multi-laboratory team were outlined in the underlying contract Statement of Work.

The NRC will rely on representation made by the contractor concerning the qualifications of the PNNL personnel assigned to this project including assurance that all information contained in the technical and cost proposals, including resumes, is accurate and truthful. A principal investigator may be called upon to present technical information at public meetings, and to provide written and oral testimony at adjudicatory hearings that may be held on this licensing action. Whether or not a hearing is to be conducted and, if so, its scope have not been determined. Consequently, participation at hearings will be covered under another task; however, a principal investigator designated for any portion of the work effort will be expected to participate in the hearing process, if necessary.

The results of this effort have the potential to impact entities regulated by the NRC and industry organizations. The contractor must be absolutely free from direct or the appearance of organizational conflict of interest with respect to any of these entities. If any work will be subcontracted or performed by consultants, the contractor shall obtain the NRC's written approval of the subcontractor or consultant prior to initiation of the subcontract effort. Conflict of interest considerations will also apply to any subcontracted effort.

## **WORK REQUIREMENTS AND SCHEDULE**

Upon the acceptance of this task order, PNNL will propose and designate the Task Leader, who

will direct the task efforts for delivering consistent, high-quality products and services that satisfy client requirements meeting scheduler and budget commitments, and the PI technical expert; the Task Leader and PI assignments are subject to the approval of the Technical Monitor. The Project Plan will be provided by the PTL; the Plan applies to all participating laboratories and integrates task management, task oversight, commitment tracking, quality and records control, schedule control, project meetings, interactions among NRC contractors involved in the project, and travel. For planning purposes, the principal investigator will participate at the site visit and public meetings on scoping and may participate in the public meetings on the NRC site-specific Draft Supplement to the GEIS. It is not expected that other interactions with the applicant (e.g., public meetings to clarify technical issues) will involve PNNL staff. PNNL will assess the need for any necessary hardware and software to meet the technical requirements of this project consistent with NRC and Federal acquisition regulations. Any acquisition will follow the process outlined in the project scope of work.

The Task Leader will document deliverables with milestones and schedules in the project monthly letter status reports (MLSRs) and the commitment tracking logs. Unless otherwise requested by the NRC Project Manager, the contractor will provide all deliverables (draft and final) to the PTL, NRC Project Manager and the NRC Technical Monitor. The contractor will identify the Job Control Number (JCN-2442), the Task Order assignment number (26), and the Technical Assignment Control Numbers on all correspondence related to this task.

Working meetings involving all principal investigators should be anticipated to be held at LANL in advance of preparing deliverables, which will serve as input to NRC documents that will be released into the public domain. Work plans should accommodate the following expected deliverables; interim milestones may be established for draft material [e.g., drafts of Technical Evaluation Reports (TER)]:

**TASK DESCRIPTION**

**DUE DATE OR DAYS**

(A) Conduct initial review of the ER and provide recommendation for acceptance review conclusion

within 15 working days after authorization

(B) Participate in the NRC/Multi-lab team site visit

no later than week of 05/17/04

(C) Perform detailed review of ER and submit input to the PTL that identifies issues and areas that should be clarified; the TER should be organized following the structure of the ER and should be phrased in question format

no later than week of 06/14/04

TASK DESCRIPTION (Cont'd)

DUE DATE OR DAYS

(D) Complete technical review of the ER and responses to RAIs, and provide TER to PTL to serve as input to the Draft Supplement to the GEIS (SEIS) and input to the Biological Assessment and, subsequently, participate in the review team working meeting at LANL (week of 09/27/04)

no later than week of 08/30/04

(E) Provide support for the public meeting near the site to discuss draft SEIS and participate in meeting, if necessary

no later than week of 01/10/05

(F) Complete assessment of public comments and responses relevant to PI assigned areas and provide input to PTL to for the working draft Final Supplement to the GEIS (FEIS) and, subsequently, participate in the review team working meeting at LANL (week of 05/09/05)

no later than week of 04/11/05

LEVEL OF EFFORT

The level of effort for this task is estimated at 6.0 staff (professional and support) weeks; the acceptance review effort should take no more than one day.

PERIOD OF PERFORMANCE

The period of performance is projected to be through June 2005.

MEETINGS AND TRAVEL

The following travel assumptions should be considered in planning the work effort. It is likely that a smaller group than the entire review team will be necessary to accomplish each activity on the project; the actual travel contingent will be determined by the Technical Monitor after discussion with the PTL. Travel in excess of the number of person-trips must be approved by the NRC Project Manager; travel within the work scope limits will be approved by the Technical Monitor. One, four-day site visit should be planned for each PI for site familiarization and information gathering meetings with the applicant and State and local governmental and other organizations. Should special provisions be necessary to assure that a PI may fully participate in site familiarization activities (including overflights and/or shoreline visits), the ANL requirements shall be identified to the Technical Monitor 30 days in advance for planning purposes. One, four-day trip should be planned for the PIs designated to attend a meeting

near the site to provide insight to members of the public to assist them in providing comments on the Draft SEIS, if necessary; actual participation will be determined by the NRC Technical Monitor. Two, four-day trips to LANL to participate in review team meetings on the working Draft and Final SEIS for each PI. PNNL will plan on making key personnel assigned to the task available for any project progress meeting or program review that may be held at PNNL while the task is active. Working meetings with NRC staff should be planned for the four week period prior to the completion of the Draft and Final SEIS. Progress meetings should be planned to occur quarterly.

#### OTHER APPLICABLE INFORMATION

The work specified in this task is license fee recoverable under 10 CFR Part 170.

#### NRC SUPPLIED INFORMATION

The Technical Monitor provided copies of the applicant's license renewal Environmental Report and will provide any pertinent NRC environmental documents and docketed correspondence on environmental issues.