

February 21, 2018

Vanessa Quinn, Chief
Radiological Emergency Preparedness Program Branch
Technological Hazards Division
Federal Emergency Management Agency
Area 8
400 C Street, South West
Washington, DC 20024

SUBJECT: REQUEST FOR FEDERAL EMERGENCY MANAGEMENT AGENCY
CONSULTATION ON THE DOMINION ENERGY PROPOSAL TO
CONSOLIDATE EMERGENCY OPERATIONS FACILITIES FOR THE
NORTH ANNA AND SURRY POWER STATIONS

Dear Ms. Quinn:

By letter dated January 16, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18025B468), the Virginia Electric and Power Company (Dominion Energy Virginia) submitted proposed changes for prior U.S. Nuclear Regulatory Commission (NRC) approval to the site emergency plans for the North Anna Power Station (NAPS) – Unit 1 and 2, and Surry Power Station (SPS) – Units 1 and 2. The changes would, in part, establish a consolidated emergency operations facility (EOF), replacing the existing local EOFs for both NAPS (Units 1 and 2) and SPS (Units 1 and 2). The consolidated EOF is referred to hereafter as the Corporate Emergency Response Center (CERC).

Dominion Energy Virginia proposes to locate the CERC at their Innsbrook Technical Center (ITC) at 5000 Dominion Boulevard in Glen Allen, Virginia, which currently serves as the backup EOF for both the NAPS and SPS sites and as the center for the headquarters support organization. Since the ITC is located approximately 30 miles from NAPS and 59 miles from SPS, prior Commission approval is required per paragraph IV.8.b to Appendix E of Part 50, “Emergency Planning and Preparedness for Production and Utilization Facilities,” to Title 10 of the *Code of Federal Regulations* (10 CFR).

Dominion is also proposing to eliminate the automatic ringdown (ARD) phones that currently exist between the local EOFs for NAPS and SPS, and the risk jurisdictions capable of activating the site-specific Early Warning System (EWS) siren systems.

The Dominion licensing action request contained in their January 16, 2018 letter, contains the following attachments, which are available in the ADAMS under Accession No. ML18025B468, or can be accessed via the hyperlink below.

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18025B468>

- Attachment 1 provides a discussion of the proposed changes;
- Attachment 2 provides a disposition of the CERP to the NAPS and SPS Emergency Plans;
- Attachment 3 provides a discussion of the additional changes for which NRG review and approval is being requested;
- Attachment 4 provides marked-up NAPS emergency plan changes;
- Attachment 5 provides proposed NAPS emergency plan changes;
- Attachment 6 provides marked-up SPS emergency plan changes;
- Attachment 7 provides proposed SPS emergency plan changes, and
- Attachment 8 provides offsite response agency letters of concurrence.

In support of these changes, in Attachment 8 to their January 16, 2018 letter, Dominion provides signed letters of concurrence from the following offsite response agencies:

- Virginia Department of Emergency Management,
- Virginia Department of Health,
- James City County,
- Surry County,
- Louisa County, and
- Spotsylvania County.

NOTE: The letters of concurrence from the counties listed above are solely provided to support the elimination of the ARD phones between the respective sites and the risk jurisdictions capable of activating the site-specific EWS siren systems. Also, for your awareness, Dominion inadvertently included two copies of the James City County letter.

At this time, the NRC is requesting Federal Emergency Management Agency's (FEMA) review and concurrence on the CERC and elimination of the ARD phones to ensure proposed changes do not have an unintended impact on offsite radiological emergency preparedness plans. A written response from FEMA is requested by no later than April 25, 2018, to support the development of a required Commission paper. Please contact me at your earliest opportunity if FEMA will not be able to meet this requested date for a response.

Dominion will also be conducting a proof-of-concept demonstration of the proposed CERC's capability to support response to events occurring simultaneously at NAPS and SPS. This demonstration drill is currently scheduled for March 5, 2018, and representatives from both NRC and the Federal Emergency Management Agency (FEMA) will be offered the opportunity to observe.

Please do not hesitate to contact me to discuss this matter further or if FEMA staff has difficulty in accessing documents in ADAMS. As always, my staff and I stand ready to support any discussions with FEMA staff on the changes proposed by Dominion, as well as the criteria and process being used to evaluate this action.

Sincerely,

/RA/

Joseph D. Anderson, Chief
Reactor Licensing Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

cc: Craig Fiore, FEMA THD
Thomas Scardino, FEMA Region III

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POWER STATIONS

DATED:

DISTRIBUTION:

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