

POLICY ISSUE
(Notation Vote)

August 9, 2018

SECY-18-0080

FOR: The Commissioners

FROM: Margaret M. Doane
Executive Director for Operations

SUBJECT: DOMINION ENERGY VIRGINIA REQUEST TO CONSOLIDATE
THE EMERGENCY OPERATIONS FACILITIES FOR NORTH
ANNA AND SURRY POWER STATIONS

PURPOSE:

This paper requests Commission approval of the proposal by Virginia Electric and Power Company (referred to hereafter as Dominion Energy Virginia) to consolidate the local emergency operations facilities (EOFs), the common back-up EOF, and the headquarters support organization for the North Anna Power Station (NAPS), Units 1 and 2, and Independent Spent Fuel Storage Installation (ISFSI), and Surry Power Station (SPS), Units 1 and 2, and ISFSI. The proposed consolidated EOF, referred to herein as the Corporate Emergency Response Center (CERC), will be located in Glen Allen, VA. Prior Commission approval is required since the proposed consolidated EOF location is more than 25 miles from the NAPS and SPS sites.

This paper does not address any new commitments or resource implications.

BACKGROUND:

An EOF provides a facility from which the licensee can manage the overall licensee emergency response during an event, including coordinating radiological and environmental assessments, determining protective actions, and communicating and coordinating with Federal, State and local agencies. This facility complements other licensee emergency response facilities, which

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are located onsite at each respective site and from which the licensee staff provides plant management and technical support to plant operations personnel during emergency conditions.

A listing of existing EOFs, located more than 25 miles from their respective nuclear power reactor sites, is provided in Enclosure 1, "Commission-Approved Emergency Operations Facilities Located More Than 25 Miles From Respective Nuclear Power Reactor Site(s)."

DISCUSSION:

Request to Consolidate the Local EOFs for North Anna and Surry

If a licensee desires to locate an EOF more than 25 miles from a nuclear power reactor site, prior Commission approval is required under paragraph IV.E.8.b of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities."

By letter dated January 16, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18025B468), as supplemented by letter dated June 13, 2018 (ADAMS Accession No. ML18169A224), Dominion Energy Virginia requested Commission approval to consolidate the respective EOFs for NAPS and SPS to a proposed CERC in the Innsbrook Technical Center, located at 5000 Dominion Boulevard in Glen Allen, VA. The proposed CERC would replace the existing local EOFs at NAPS and SPS. It is approximately 30 miles from the NAPS site and approximately 59 miles from the SPS site, and currently serves as the backup EOF for both sites, and as the center for the licensee's headquarters support organization.

Dominion Energy Virginia states in its letter that:

The North Anna Unit 3 (NA3) combined operating license [COL] (NPF-103, 052000017) Emergency Plan describes the NAPS local EOF and the central (back-up) EOF. Following approval and implementation of this license amendment, these facilities will cease to exist. A NA3-specific license amendment would be needed to reference the proposed CERC in the NA3 COL Emergency Plan prior to commencing operation at NA3. If Dominion Energy Virginia decides to construct NA3, a separate license amendment would be developed and submitted.

Therefore, NAPS Unit 3 is not a part of this review. As such, further references to NAPS in this evaluation will only apply to Units 1 and 2, and the ISFSI. Separate Commission approval will be required per Appendix E to 10 CFR Part 50 at a later date if the licensee eventually decides to consolidate the local EOF for NAPS Unit 3 with the CERC proposed in the licensee's submittal.

Staff Consideration

In its evaluation of Dominion Energy Virginia's request to consolidate the EOFs for NAPS and SPS at the proposed CERC, the staff followed all relevant requirements and guidance. A detailed discussion of the requirements and guidance, as well as the staff's evaluation, is provided in Enclosure 2, "Evaluation of Request to Consolidate the North Anna Power Station

and Surry Power Station Local Emergency Operations Facilities at Corporate Emergency Response Center.”

Requirements and Guidance

The regulations for evaluating a request to consolidate an EOF are contained in 10 CFR 50.47(b) and Appendix E to Part 50. The requirements include the following provisions and capabilities that must be met when a site is located more than 25 miles from the EOF:

- (1) Space for members of an NRC site team and Federal, State, and local responders;
- (2) Additional space for conducting briefings with emergency response personnel;
- (3) Communication with other licensee and offsite emergency response facilities;
- (4) Access to plant data and radiological information, and
- (5) Access to copying equipment and office supplies.
- (6) The capability for obtaining and displaying plant data and radiological information for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves;
- (7) The capability to analyze plant technical information and provide technical briefings on event conditions and prognosis to licensee and offsite response organizations for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves; and
- (8) The capability to support response to events occurring simultaneously at more than one nuclear power reactor site if the emergency operations facility serves more than one site.

Relevant guidance provides criteria that the staff evaluates during its review; the criteria ensure that the review considers the following aspects of the EOF:

- Functions;
- Location, Structure, and Habitability;
- Staffing and Training;
- Size;
- Radiological Monitoring;
- Communications;
- Instrumentation, Data System Equipment, and Power Supplies;
- Technical Data and Data System; and
- Records Availability and Management.

Staff Evaluation

The NRC staff's evaluation analyzed whether the licensee complied with the regulations and followed the applicable guidance to demonstrate the ability of the proposed facility to perform the key functions of the EOF for an emergency declaration requiring EOF activation at multiple nuclear power reactor sites. In addition, the staff's evaluation considered concurrence by affected state and local entities in support of proposed consolidation, and FEMA's review of impacts of the proposed consolidation on existing State and local radiological emergency response plans. The staff's evaluation consisted of a review of proposed emergency plan change and supporting documents, as well as a walkdown of the proposed facility.

Drill Observation

While not required, the NRC staff and FEMA jointly observed a dual-site drill from the CERC on March 5, 2018, which involved simulated, simultaneous emergency events at both NAPS and SPS. Dominion Energy Virginia also provided the opportunity for the Commonwealth of Virginia to participate. The staff's observation of the dual-site drill, the staff confirmed that the proposed CERC can effectively respond to and coordinate response efforts for events occurring simultaneously at the NAPs and SPS sites. Further, the staff confirmed that the proposed CERC would not negatively alter the EOF functions. Therefore, the staff has concluded that the CERC is consistent with relevant guidance and the requirements listed in Enclosure 2.

CONCLUSION:

On the basis of its evaluation, the staff concludes that the proposed CERC would fulfill necessary emergency response functions and meet applicable regulations in 10 CFR 50.47 and Appendix E of 10 CFR Part 50, and the criteria set forth in applicable guidance. Given the advanced technological capabilities of the proposed facility, its capacity to address multi-site events, and the staffing of an emergency response organization comprised of experienced and diverse personnel from the Dominion Energy Virginia corporate offices, the consolidation of the local EOFs for NAPS Units 1 and 2 and ISFSI and SPS Units 1 and 2 and ISFSI, at the proposed CERC would not impact the ability of the facility to effectively support Dominion Energy Virginia's emergency response at the sites that the facility serves. The NRC staff finds that, if the proposed CERC is implemented, the NRC would continue to have reasonable assurance that protective measures can and will be implemented in the event of a radiological emergency at the sites that the proposed CERC will serve.

RECOMMENDATIONS:

The staff recommends Commission approval of the proposed consolidation of the local EOFs for NAPS Units 1 and 2 and ISFSI, and SPS Units 1 and 2 and ISFSI, at the proposed CERC. Commission approval by November 30, 2018, would support the licensee's requested approval date for the EOF relocation.

COORDINATION:

The Office of the General Counsel reviewed this package and has no legal objection.

/RA/

Margaret M. Doane
Executive Director
for Operations

Enclosures:
As stated

SUBJECT: DOMINION ENERGY VIRGINIA REQUEST TO CONSOLIDATE THE EMERGENCY OPERATIONS FACILITIES FOR NORTH ANNA AND SURRY POWER STATIONS DATED AUGUST 9, 2018

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ADAMS Accession Nos: ML18135A239 (Package); ML18135A245 (SECY Paper);
 ML18135A252 (Enclosure 1); ML18135A266 (Enclosure 2)

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