



February 4, 2021

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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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DOMINION ENERGY NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNITS 1, 2 AND 3
REVISION TO EMERGENCY PLAN - REPORT OF CHANGE

Pursuant to 10 CFR 50.54(q)(5) and 10 CFR 72.44(f), a summary of the change analysis for Revision 63 to the Millstone Power Station (MPS) Emergency Plan is provided in the attachment. The change to the Emergency Plan was effective on December 17, 2020. Incorporation of new Emergency Action Levels for Millstone, which were developed using the NRC endorsed guidance in Nuclear Energy Institute (NEI) document 99-01, Revision 6 (ADAMS Accession No. ML19011A237), has been previously approved by the NRC. The other changes incorporated in this revision did not require prior NRC approval and do not implement actions that reduce the effectiveness of the MPS Emergency Plan. The Emergency Plan continues to meet the standards of 10 CFR 50.47(b) and Appendix E.

10 CFR 50.54(q)(5) requires licensees report changes made to the emergency plan not requiring prior NRC approval within 30 days after the change is put into effect. Condition Report CR1164766 has been entered into the Corrective Action Program to document Revision 63 not meeting the 30-day reporting requirement.

If you have any questions or require additional information, please contact Shayan Sinha at (804) 273-4687.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark D. Sartain", with a long horizontal flourish extending to the right.

Mark D. Sartain

Vice President – Nuclear Engineering & Fleet Support

Commitments made by this letter: None

Attachment:

Millstone Power Station Emergency Plan, Revision 63, 10 CFR 50.54(q)(5) Summary

cc: Regional Administrator, Region I
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ATTACHMENT

Millstone Power Station Emergency Plan, Revision 63
10 CFR 50.54(q)(5) Summary

DOMINION ENERGY NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNITS 1, 2 AND 3

Millstone Power Station Emergency Plan, Revision 63, 10 CFR 50.54(q)(5) Summary

Revision 63 of the Millstone Emergency Plan incorporated new Emergency Action Levels (EALs) developed using the NRC endorsed guidance in Nuclear Energy Institute (NEI), document 99-01, Revision 6 (ADAMS Accession No. ML19011A237). These EAL changes were approved by the NRC under License Amendment 119 for Millstone Power Station (MPS) Unit 1, License Amendment 336 for MPS Unit 2, and License Amendment 274 for MPS Unit 3 (ADAMS Accession No. ML19305D248). The Emergency Action Level (EAL) Matrix is discussed in Section 4.2, "Emergency Classification System," of the Millstone Power Station Emergency Plan. Incorporated by reference, the EAL Matrix tables and Technical Basis Documents (TBDs) are part of the Emergency Plan.

Millstone Emergency Plan Revision 63 incorporated the changes described below. A description of why each change was not a reduction in the effectiveness of the emergency plan and the regulatory basis for each non-editorial change are provided.

1. The references to "Example" and the Example EAL tables were removed from Section 4, "Classification System," and Appendix I, "Emergency Action Level Scheme," of the Emergency Plan. The Example EAL tables in the Emergency Plan only illustrated the EAL schemes, and were not used for classification purposes. The EAL tables used for classification purposes were updated to utilize the guidance from NEI 99-01, Revision 6, as described above. The updated EAL tables used for classification purposes are located in procedures MP-26-EPI-FAP06-001, 002, and 003, and a reference to these procedures was added to Appendix I of the Emergency Plan. The EAL tables in the above procedures continue to meet the requirements of 10 CFR 50, Appendix E, and NUREG-0654.
2. The terminology used to describe the technology used to communicate between the station, the emergency response organization (ERO), and state and local agencies during an emergency was changed throughout the Millstone Emergency Plan. Specifically, the ARCOS technology is being replaced with an Everbridge notification system. The Everbridge system will automatically call (on both cellular phones and home phones), text message, and email ERO members, and state and local agencies to notify them of a declared emergency. With the new notification system in place, radiopagers are no longer used to activate the Millstone ERO members. The effectiveness of the MPS Emergency Plan is maintained because the requirements of Appendix E to 10 CFR Part 50 and the 10 CFR 50.47(b)(6) standards for emergency communications continue to be met. The offsite communication system remains in place and available for use between the facilities.

3. References to state posture codes were removed throughout the Millstone Emergency Plan. The State of Connecticut has discontinued using state posture codes and has requested that Millstone also discontinue using state posture codes as part of EAL classification notifications. The classification levels and definitions remain the same (UNUSUAL EVENT, ALERT, SITE AREA EMERGENCY, GENERAL EMERGENCY). The classification levels continue to meet the requirements of 10 CFR 50, Appendix E, and NUREG-0654, without the use of posture codes.
4. The reference to "major EAL heading" was deleted in the list for additional Emergency Notification Form (ENF) information in Section 6.1, "Notification and Activation of Emergency Organizations." The previously used Incident Report Form (IRF) references the "Name and Title of communicator" and "major and minor EAL heading." The new ENF has the same fields for the Emergency Communicator and Director of Station Emergency Operations (DSEO), and is being specified in Section 6.1 as "Name of sender and approver." The deletion of the major EAL heading in the new ENF does not affect the notification process, as the more descriptive minor EAL heading is still being provided.
5. The Committed Dose Equivalent (CDE) component for thyroid was eliminated from Section 6.2.4, "Release Rate and Dose Estimate Methodology," as a threshold value for classification and protective action recommendations (PARs). CDE thyroid dose is measured in values applicable to adults and children for off-site dose assessment. This change is consistent with Environmental Protection Agency's (EPA) early phase protective action guides (PAGs) provided in the January 2017 EPA PAG Manual, with agreement provided by the States of Connecticut and New York. The Millstone Station ERO will continue to provide protective measure recommendations to the states based on child thyroid CDE, but this is not considered to be a component of the PAR.
6. The Unit 2 Drumming Area Radiation Monitor (RM-9813) was deleted from Table H-1, "On-Site Assessment Equipment and Facilities." This sensor is a shielded process monitor with local indication only, and is used to monitor radiation levels of spent resin while transferring to transport casks. Based on the monitor's function and its local indication capability, it was determined that the monitor is not important to emergency response for MPS. The emergency planning standard for emergency facilities and equipment per 10 CFR 50.47(b)(8), and for accident assessment per 10 CFR 50.47(b)(9) are met because RM-9813 is not used for determining the magnitude, or assessing the impact, of offsite releases. The removal from Table H-1 of the Emergency Plan does not reduce the capability of the ERO to perform assigned functions and tasks.

7. Administrative updates were made to Letters of Agreement (LOA) with offsite agencies in Appendix B, "Letters of Agreement." There were no changes to the arrangements for requesting and using assistance. Each of the remaining entities with LOAs were contacted to confirm that their agreement remained in effect. The emergency planning standard for requesting and effectively using assistance resources per 10 CFR 50.47(b)(3) continues to be met, because these arrangements have been verified to be current and updated as appropriate.

Editorial changes were made to change Security Shift Operations Supervisor to Security Shift Supervisor throughout the Millstone Emergency Plan, and to correct a typographical error for a radiation monitor identification number in Appendix H, "Radiological Assessment Equipment and Facilities."