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Sent: Thursday, April 14, 2022 7:44 AM
To: norris, michael; Hoffman, Raymond; Quichocho, Jessie; Klos, John
Subject: Dominion Presentation Slides for April 21, 2022 Public Meeting on EP
Attachments: Public Meeting Presentation - EP Staffing and Augmentation LAR
04132022.pptx

Attached are the slides that Dominion plans to use at the subject public meeting.

ed

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Sent Date: 4/14/2022 7:43:30 AM
Received Date: 4/14/2022 7:43:00 AM
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Files	Size	Date & Time
MESSAGE	96	4/14/2022 7:43:00 AM
Public Meeting Presentation - EP Staffing and Augmentation LAR 04132022.pptx 86051		

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Priority: Normal
Return Notification: No
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Proposed License Amendment Request:

**On-shift Staffing and
ERO Augmentation Response Time**

North Anna and Surry Power Station

NRC Public Meeting
April 21, 2022
2:00 pm – 3:30 pm EST



Agenda

- Summary of Proposed Changes
- Reason for the Proposed Changes
- Current and Proposed On-Shift Staffing
- Current and Proposed Augmented Staffing
- Change Analysis
- Timeline & Conclusion

Summary of Proposed Changes

- Extension of augmentation response times from 45, 60, and 75 minutes to 90 minutes
- Extension of facility activation requirements for the Technical Support Center (TSC) and Operational Support Center (OSC) from 60 minutes to 90 minutes; and for the Corporate Emergency Response Center (CERC) from 75 minutes to 90 minutes
- Definition of criteria for ‘facility activation’
- Redefinition of “minimum staff” positions to align with new facility activation criteria



Summary of Proposed Changes

- Revision of On-Shift Staffing to align with NUREG-0654, Revision 2, Table B-1
- Reduction of the Emergency Action Level (EAL) classification at which the Offsite Survey Teams are dispatched from Site Area Emergency (SAE) to Alert
- Removal of references to activities managed by processes outside of the Emergency Plan
- Relocation of administrative positions from the Emergency Plan to implementing procedures
- Removal of reference to the Local Media Center (LMC)

Reason for Proposed Changes

- Better align site Emergency Plans with current regulatory guidance
- Increase the number of individuals available for immediate response to an event by extending response time requirements

On-Shift Staffing Summary

Command-and-Control & Oversight	Crediting only Operations personnel performing EP functions
Communication	2 positions
Radiological Assessment	3 positions: <ul style="list-style-type: none">• RP Tech dedicated dose assessment position• RP Tech for In-plant/Onsite (Out-of-Plant) Surveys• RP Tech for job coverage/protective actions
System Engineering & Technical Support	1 position (STA) <ul style="list-style-type: none">• Procedure analysis completed to assess on-shift activities for the first 90 minutes after an event in accordance with RIS 2016-10
Corrective Actions	Credit defense-in-depth through use of shared safety systems, Beyond Design Basis (BDB) strategies, and FLEX capabilities

Change Analysis

- Functional Analysis completed for NUREG-0654, Revision 2, Table B-1 Emergency Preparedness Functions
- Procedure Analysis assessed on-shift activities as described in site procedures for the first 90 minutes after the event
- Credit taken for shared safety systems and Beyond Design Basis / FLEX capability

Timeline & Conclusion

Major Milestones:

2022	Q2	Submit License Amendment Request to NRC
2023	Q2	Receive Safety Evaluation Report (SER) from NRC
	Q4	Implementation

Proposed License Amendment Request:

- Enhances existing emergency response capability
- Continues to meet regulatory requirements



References

- 1) NUREG-0654/FEMA-REP-1, Revision 2, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,” December 2019. (ADAMS Accession No. ML19347D139)
- 2) NRC Regulatory Issue Summary (RIS) 2016-10, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation,” dated August 5, 2016. (ADAMS Accession No. ML16124A002)