



R. A. JONES  
Vice President

Duke Power  
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Seneca, SC 29672

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December 18, 2003

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Request for Exception to NUREG-0696 Guidance on  
Emergency Operations Facility (EOF) Location  
Oconee Nuclear Station  
License Numbers NPF-38, NPF-47, NPF-55  
Docket Nos. 50-269, 50-270, 50-287

In accordance with 10CFR50.54(q), Conditions of Licenses, Duke Energy Corporation ("Duke") requests that an exception be granted to the Emergency Operations Facility (EOF) location requirements contained in NUREG-0696 for Oconee Nuclear Station. Duke proposes relocating the EOF for Oconee to Charlotte, North Carolina, at the Duke Energy Corporation General Office, approximately 125 air miles from Oconee. Since the new proposed location of the EOF involves an exception to the guidance in NUREG-0696 for locating an EOF within 20 miles of the TSC, Duke is requesting NRC approval of the change prior to implementation. The EOF functions will be relocated to the existing EOF used by Catawba and McGuire Nuclear Stations. This relocation does not alter the functions of the EOF as described in NUREG-0696.

The Catawba/McGuire EOF (hereafter referred to as the Charlotte EOF) has been used since August 1987, and has proved to be an effective facility for implementation of the nuclear station emergency plans. The Charlotte EOF is an equivalent facility to the existing Oconee EOF. Incorporation of Oconee into the Charlotte EOF will not adversely affect the ability of the EOF to be staffed in a timely manner. The EOF will be staffed primarily with personnel from the Duke Nuclear General Office, with support from the McGuire and Catawba Nuclear Station staffs. This proposed consolidation will improve the overall effectiveness of the Oconee emergency response capability by increasing the number of station personnel available to staff the site emergency response facilities.

Duke Energy Corporation has discussed this proposal with South Carolina (SC) Emergency Management, Oconee and Pickens County Emergency Management, and NRC Region II. South Carolina and NRC Region II are familiar with the Charlotte EOF because it is the facility used for responding to an event at Catawba. The state and county emergency responders operate from their own EOCs. The State of South Carolina, in its emergency plan, designates liaisons to respond to the EOF to interact with those responsible for off-site monitoring, dose assessment, and protective action recommendations. These state liaisons would be able to respond from Columbia, South Carolina, to Charlotte, North Carolina, more quickly than to the Oconee area. Oconee and Pickens Counties are the only counties in the 10

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mile Emergency Planning Zone for Oconee Nuclear Station. Their plans require dispatch of the County Public Information Officer (PIO) to the Joint Information Center, but they do not send a liaison to the EOF. Duke provides a utility liaison to the state and county Emergency Operations Centers. Since communications between the counties and the EOF are by telephone, there is no difference whether the EOF is 10 miles away or 125 miles away.

The NRC has approved similar EOF relocations for Clinton Power Station and Three Mile Island (reference ADAMS Accession Numbers ML020800179 and ML030790023, respectively). A significant factor in the NRC approval of the central EOF concept is the fact that the state and local emergency responders operate from their own emergency centers and send representatives to the EOF to enhance their overall response. As a result, there is no change in communications arrangements with the state and local governments resulting from relocating the EOF. Incorporation of Oconee into the Charlotte EOF will not adversely impact the capabilities of the EOF staff to work with the State, County, and NRC Site team responders.

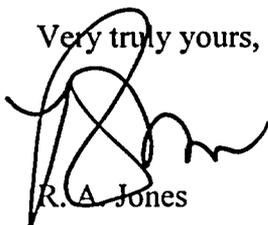
The State also dispatches its Public Information Team to the Joint Information Center. The Joint Information Center for Oconee will continue to be located near the Oconee site to allow local, state, and national media a place to obtain official information. All current Oconee Emergency Response functions for the communication of information to the public via the news media by designated spokespersons will remain at the Joint Information Center (JIC) located on Issaquena Trail in Clemson, SC. The personnel currently serving as Public Spokespersons for Oconee will continue to fill that role.

The proposed change to the Licensing Basis has been reviewed and approved by the Plant Operations Review Committee and Nuclear Safety Review Board.

Approval for relocating the Oconee EOF to Charlotte is requested by June 30, 2004, to support implementation in plans, procedures, and training by the end of 2004. Actual implementation will occur only after determination of the EOF's ability to effectively support an Oconee event.

A summary of the proposed change including justification is contained in Attachment 1. Letters of concurrence from the offsite agencies are contained in Attachment 2. There are no new commitments to the NRC contained within this correspondence. If you have questions, call Tina Kuhr at (704) 382-3151 or Rodney Brown at (864) 885-3301.

Very truly yours,



R. A. Jones

December 18, 2003  
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Cc: Luis A. Reyes, Administrator, USNRC Region II  
Leonard Olshan, ONS Project Manager, USNRC  
Mel C. Shannon, Senior Resident Inspector, ONS

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Bcc: J. R. Brown  
E. M. Kuhr  
L. E. Nicholson  
B. G. Davenport  
J. J. Fisticaro  
R. L. Gill  
R. Duggleby (SC-EMD)  
S. Threatt (SC-DHEC)  
ELL  
Oconee Master File

Attachment 1

Oconee Nuclear Station  
EOF Relocation Justification

Attachment 1  
Oconee Nuclear Station EOF Relocation Justification

**Description and Impact of the Proposed Change**

This proposed change requests the relocation of the Oconee Nuclear Station (ONS) Emergency Operations Facility (EOF) located on Issaquena Trail Road in Clemson, South Carolina, to the facility currently used as the Catawba/McGuire Emergency Operations Facility at 422 South Church Street in Charlotte, North Carolina. The current Oconee EOF in Clemson is located approximately 9.5 miles from ONS. The proposed EOF in Charlotte is approximately 125 miles from ONS. The EOF in Charlotte has been shown to be an adequate facility, as demonstrated by its successful use by McGuire and Catawba since August 1987. (See NRC Inspection Reports 50-413 and -414/87-36, and 50-369 and -370/88-03.)

Provisions for access of the NRC site team to the station, for the South Carolina liaisons in Charlotte, and for the state/county Public Information Team will be made to allow each group to best perform its role. The State of South Carolina (SC), in its emergency plan, designates liaisons to respond to the EOF and to interact with those responsible for off-site monitoring, dose assessment, and making protective action recommendations. These individuals would be able to respond from Columbia, SC, to Charlotte more quickly than to the Oconee area. The State liaisons are familiar with the Charlotte EOF, because they already respond to it for Catawba exercises and events. South Carolina no longer sets up a Forward Emergency Operations Center (EOC) in Clemson. The SC State decision makers stay in Columbia. Duke sends liaisons to the SC State and County EOCs for all exercises and events.

The state also dispatches its Public Information Team to the Joint Information Center (JIC). A JIC will continue to be established at the current location on Issaquena Trail Road in Clemson and will provide the local, state, and national media a place to get the official source of information in an emergency. Oconee and Pickens Counties are the only counties in the 10 mile Emergency Planning Zone of Oconee Nuclear Station. Their plans require dispatch of the County Public Information Officer (PIO) to the JIC, but there is no liaison to the EOF.

For an Oconee event, Duke Power Public Affairs currently staffs the World of Energy (visitor center), Oconee JIC, Oconee EOF and Charlotte JIC. After the Oconee EOF is relocated to Charlotte, Public Affairs will staff positions in the Charlotte JIC and the Charlotte EOF using the trained staff that currently responds for McGuire and Catawba events. The Public Affairs staff currently assigned to the Oconee EOF will become part of the Oconee JIC staff to provide additional support to the World of Energy and Oconee JIC. Per current processes, the first news release is written at the World of Energy, with subsequent news releases written and approved in the EOF and placed on a LAN share drive for use by the JICs at Oconee and in Charlotte. This news release process will be unaffected by the relocation of the EOF. Two bridge lines are available to aid communications among the facilities, one for the Technical Liaisons and one for Media Coordination. The Charlotte and Oconee JICs also have SC state radios to provide a backup communication link to the state.

## **Justification of the Proposed Change – Evaluation against NUREG-0696**

### Functions

The proposed EOF relocation does not alter the basic functions of the EOF. This facility is adequate to ensure the continued, effective, and timely performance of the following functions:

- Management of overall licensee emergency response
- Coordination of radiological and environmental assessment
- Determination of recommended public protective actions
- Coordination of emergency response activities with Federal, State, and local agencies.

The main role of the EOF is to relieve the plant staff of the functions of keeping the state and county emergency organizations informed, for directing dose assessment and field monitoring, for managing the informational needs of the media, interested industry groups, and elected officials, and for supporting the accident assessment needs of the TSC Staff. Region II is currently responding to a common, central facility for TVA. The NRC's response time to Charlotte by air is similar to the response time to Oconee. The NRC would have access to plant data through the Duke Satellite Display System (SDS) and ERDS. They also have phones on the Emergency Telecommunications System (ETS) in Charlotte.

Equipment already exists in the Charlotte EOF for the acquisition, display, and evaluation of radiological, meteorological, and plant system data used to determine offsite protective measures. Actual release information is provided by the field monitoring teams and is used in determining appropriate protective action recommendations. Thus, plant and effluent data would be provided on as timely a basis at an EOF for Oconee in Charlotte as it would be at a near-site location.

Normal industrial security is already provided for the Charlotte EOF and processes are already in place to upgrade security during an activation.

### Location, Structure, and Habitability

The Charlotte EOF has been used since August 1987, and has proved to be an effective facility for implementation of the nuclear station emergency plans. The Charlotte EOF has been previously evaluated by the NRC for Catawba and McGuire Nuclear Stations (NRC Inspection Reports 50-369/88-03 and 50-370/88-03, and 50-413/87-36 and 50-414/87-36). The facility is farther than 10 miles from any of the Duke nuclear stations; therefore, there are no specific habitability criteria. The Charlotte EOF is a functionally equivalent facility to the existing Oconee EOF.

### Staffing and Training

Incorporation of Oconee into the Charlotte EOF will not adversely affect the ability of the EOF to be staffed in a timely manner. The Oconee EOF will be staffed with the experienced EOF staff from the Duke Power Nuclear General Office in Charlotte, and personnel from the McGuire and Catawba Nuclear Stations. The EOF staff has demonstrated their ability to staff the EOF

Attachment 1  
Oconee Nuclear Station EOF Relocation Justification

within 75 minutes of event declaration during annual augmentation drills for McGuire and Catawba. This EOF staff will include personnel to manage overall licensee emergency response, coordinate radiological and environmental assessment, determine recommended public protective actions, and interface with offsite officials.

The Charlotte EOF staff will be trained in emergency response for Oconee. Key decision makers will attend Oconee specific training as required based on their prior experience and training. The relocation of the Oconee EOF functions to the Charlotte EOF will improve the overall effectiveness of the Oconee emergency response capability by increasing the number of station personnel available to staff the site emergency response facilities.

Size

The Charlotte EOF size has proven to be adequate during drills and exercises for Catawba and McGuire since 1987, including staffing by the state and the NRC site team in the McGuire exercise on August 24, 1999.

Radiological Monitoring

The Charlotte EOF is beyond 10 miles from all three Duke nuclear stations, and therefore does not require radiological monitoring equipment.

Communications

The communications systems available in the EOF in Charlotte are:

- Duke telephone system
- Selective Signaling System (for state/county notifications)
- Decision Line (for discussion/coordination of protective action recommendations)
- Commercial telephones from the Charlotte switch network
- Radio System to communicate with the Field Monitoring Teams
- NRC Emergency Telecommunications System phones
- South Carolina Local Government Radio
- Fax transmission capability

The emergency communications systems at the Charlotte EOF are designed to ensure the reliable, timely flow of information between all parties having an emergency response role. The single facility results in commonality of communications and interface with offsite officials and liaisons. The Selective Signaling System continues to be the primary means of communicating changes in event classification and protective action recommendations to the state and counties. The Selective Signaling System, as well as the Decision Line, operate on a combination of the Duke Telecommunications network and leased circuits. Two telephone extensions will be added to the Oconee Decision Line, one for the EOF Director and one for the South Carolina State Liaison.

Existing commercial telephone service will serve as the designated backup means of communications in the event of a Selective Signaling System or Decision Line Failure. Duke

## Attachment 1

### Oconee Nuclear Station EOF Relocation Justification

Energy has telecommunications capabilities that can provide access to long distance networks without having to go through a local telephone company switch. Long distance calls from the Charlotte EOF are routed through Duke's corporate PBX in Charlotte directly to either Sprint or MCI. Telephones are provided for the respective Federal and State representatives, including lines for faxes/modems. Also, telephones for the NRC Emergency Telecommunications System, the Emergency Notification System (ENS) and Health Physics Network (HPN), are available. Fax machines are available in the EOF to support the transmission of information between the Emergency Response Facilities and with state, local, and federal authorities.

A control station with a remote connection to the EOF in Charlotte will be added to allow the EOF to communicate with the Oconee Field Monitoring Teams. A new control loop drop will be configured over the company network, and a remote with an encoder for the counties will be installed in the Charlotte EOF, to provide backup radio communications with the 10 mile EPZ counties for Oconee.

### Instrumentation, Data System Equipment, and Power Supplies

Various plant parameters are available to the EOF staff via a connection through Duke's Wide Area Network. Data available at the EOF is a snapshot of data (~1 second minimum frequency) from each unit's OAC. Actual OAC terminals are available in the TSC as described elsewhere in the Emergency Plan. The same data is available in the proposed Charlotte EOF as is currently available at the Oconee EOF in Clemson. Data from SDS can be displayed on projection screens in the EOF Director's Area, and on large screen monitors in other areas in the facility. The PCs in the Dose Assessment Area are capable of running the dose projection computer program (RADDOSE V) and accessing SDS data.

The Charlotte EOF draws its primary power from commercial power. The Charlotte EOF receives backup power from the Duke Energy Corporation Power Building Diesel Generators. The swap to the Diesel Generators is an auto swap with an approximate 10 to 15 second delay in the egress lighting coming on. There is adequate egress lighting in all normally occupied areas of the EOF. The lighting that is available would sustain a work environment in the EOF. In addition, power is supplied to orange electrical outlets that are in the Emergency Operations Facility. There are orange electrical outlets that receive Diesel Generator backup power in the following rooms:

- EOF Off-Site Monitoring Room (One two plug receptacle)
- EOF Accident Assessment/Operations Interface Room (One four plug receptacle)
- EOF NRC Room (Two two plug receptacles)
- EOF Radiological Assessment Room (One four plug receptacle)
- EOF Off-Site Agency Communications Room (Two four plug receptacles)
- EOF Data Coordinator Room (One four plug receptacle)
- EOF Directors Area (One four plug receptacle)

There is a Preventive Maintenance/Periodic Testing program for the Power Building Diesel Generator.

Attachment 1  
Oconee Nuclear Station EOF Relocation Justification

Records Availability and Management

The plant records currently stored in the EOF in Clemson will be relocated to the EOF in Charlotte. Hard copies of key reference materials are maintained in the Nuclear General Office facilities in Charlotte, and are brought to the EOF upon activations. In addition, station design documentation, plant drawings, UFSAR, procedures, etc. are available via Local Area Network connection from the Nuclear Electronic Document Library (NEDL).

**Attachment 2**

**Oconee Nuclear Station EOF Relocation**

**State and Emergency Planning Zone County Letters**



R. A. JONES  
Vice President

Duke Power  
29672 / Oconee Nuclear Site  
7800 Rochester Highway  
Seneca, SC 29672

864 885 3158  
864 885 3564 fax

November 12, 2003

Mr. Ronald Osborne, Director  
South Carolina Emergency Preparedness Division  
1100 Fish Hatchery Road  
West Columbia, South Carolina 29172

Attention: Mr. Bob Duggleby, Manager Technological Plans

To enhance Emergency Preparedness, Duke Energy Corporation plans to consolidate the Oconee Emergency Operations Facility (EOF) into the EOF located in Charlotte, North Carolina, presently used by Catawba and McGuire Nuclear Stations. Prior to seeking approval from the Nuclear Regulatory Commission, Duke is requesting written concurrence from your agency regarding the common EOF concept.

The Catawba/McGuire EOF (hereafter referred to as the Charlotte EOF) is an equivalent facility to the existing Oconee EOF. Incorporation of Oconee into the Charlotte EOF will not adversely affect the ability of the EOF to be staffed in a timely manner. The EOF will be staffed primarily with personnel from the Duke Nuclear General Office, with support from the McGuire and Catawba Nuclear Station staffs. This proposed consolidation will improve the overall effectiveness of the Oconee emergency response capability by increasing the number of station personnel available to staff the site emergency response facilities. Utilizing common EOF procedures and training will result in a more consistent staff response to an emergency.

The Joint Information Center for Oconee will continue to be located near the Oconee site to allow local, state, and national media a place to obtain official information. All current Oconee Emergency Response functions for the communication of information to the public via the news media by designated spokespersons will remain at the Joint Information Center (JIC) located on Issaquena Trail in Clemson, SC. The personnel currently serving as Public Spokespersons for Oconee will continue to fill that role.

Your continued support of the Duke Emergency Preparedness program is greatly appreciated. If you have questions on this proposal, call Tina Kuhr at (704) 382-3151 or Rodney Brown at (864) 885-3301.

Yours truly,

A handwritten signature in black ink, appearing to be "R. A. Jones".

R. A. Jones

Cc: Rodney Brown  
Larry Nicholson  
Tina Kuhr  
NEP File #500  
Oconee Master File

Relocation of the Oconee Emergency Operations Facility  
From Clemson, South Carolina to Charlotte, North Carolina

I have reviewed the Duke Energy Corporation proposal to relocate the Emergency Operations Facility (EOF) for Oconee from Clemson, South Carolina, to Charlotte, North Carolina and agree to the EOF relocation as described.



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Mr. Ronald Osborne, Director  
South Carolina Emergency Management Division

11/17/03  
Date



R. A. JONES  
Vice President

Duke Power  
29672 / Oconee Nuclear Site  
7800 Rochester Highway  
Seneca, SC 29672

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864 885 3564 fax

November 12, 2003

Mr. Don Evett, Director  
Pickens County Emergency Management Agency  
1509 Walhalla Highway  
Pickens, SC 29671

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\_\_\_\_\_  
Mr. Don Evett, Director  
Pickens County Emergency Management Agency

16-12-03  
\_\_\_\_\_  
Date



R. A. JONES  
Vice President

Duke Power  
29672 / Oconee Nuclear Site  
7800 Rochester Highway  
Seneca, SC 29672

864 885 3158  
864 885 3564 fax

November 12, 2003

Mr. Henry Gordon, Director  
Oconee County Emergency Management Agency  
412 South Pine Street  
Walhalla, SC 29691

Dear Mr. Gordon:

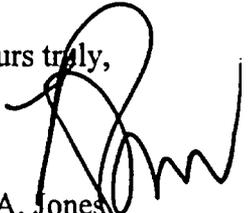
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*Henry Gordon*

Mr. Henry Gordon, Director  
Oconee County Emergency Management Agency

11-17-03

Date