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June 8, 2005

U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTENTION: Document Control Desk

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

In accordance with 10CFR50.54(q), Conditions of Licenses, Duke Energy Corporation (Duke) submitted a request on December 18, 2003, that an exception be granted to the Emergency Operations Facility (EOF) location requirements contained in NUREG-0696 for Oconee Nuclear Station. Additional information was provided to the NRC on March 25, 2004, December 14, 2004, and April 21, 2005, to support this submittal.

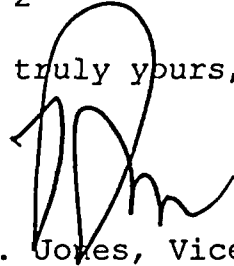
In a conference call on May 12, 2005, the NRC discussed clarifying questions related to the April 21, 2005, submittal. During this conference call, it was determined that certain pages of the April 21, 2005, submittal should be amended to clarify our response. The amended pages are included in Attachment 1. In addition, it was requested that procedure steps be provided that document the process to be used to acquire additional computer resources to support a multi-site event. Attachment 2 provides these draft procedure steps.

There are no new NRC commitments contained within this correspondence. If you have questions, call Rodney Brown at (864)885-3301 or Tina Kuhr at (704)382-3151.

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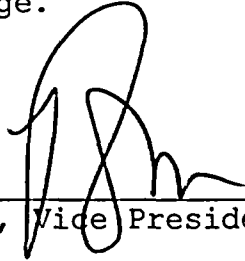
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Very truly yours,

A handwritten signature in black ink, appearing to read 'R. A. Jones', written over the closing 'yours'.

R. A. Jones, Vice President  
Oconee Nuclear Site

R. A. Jones, affirms that he is the person who subscribed his name to the foregoing statement, and that all the matters and facts set forth herein are true and correct to the best of his knowledge.



\_\_\_\_\_  
R. A. Jones, Vice President

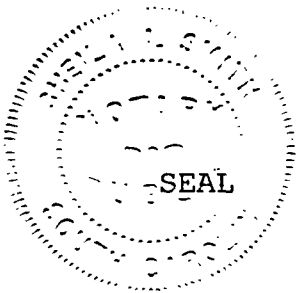
Subscribed and sworn to me: \_\_\_\_\_

6/8/2005  
Date

Shirley A Smith Notary Public

My commission expires: \_\_\_\_\_

6/12/2013  
Date



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xc w/Attachments:

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**ATTACHMENT 1**

**REVISED JANUARY 19, 2005 RAI RESPONSES  
(Re: April 21, 2005 Letter)**

This attachment contains revisions to the following RAI responses provided to the NRC on April 21, 2005. These pages replace the original pages provided in the aforementioned response. Change bars are included on these revised pages.

RAI Attachment 1, Page 5 of 7

RAI Attachment 1, Page 7 of 7

RAI Attachment 2, Page 3

Attachment 3, Page 2

Attachment 3, Page 3

RAI Attachment 4, Page 5 of 6

RAI Attachment 5, Page 1 of 2

5. In the response to RAI-17 and Attachment 1 to the December 18, 2003 submittal, the licensee states that power from the diesel generator backup power is supplied to orange electrical outlets located in the various EOF rooms. Identify whether an evaluation has been performed to verify that appropriate equipment will remain energized via orange outlets to support continuing accident assessment functions (e.g., dose assessment) upon a loss of normal utility circuits.

An evaluation of the emergency power supply capabilities for the Charlotte EOF was conducted in March 2005. The evaluation is included as Attachment 4.

This evaluation determined that additional extension cords would be required to connect identified equipment not already on emergency power circuits. This action would have a minimal impact on EOF operations until emergency power is made available to the designated equipment. During this brief interruption in EOF operations, the TSC would assume event responsibilities until the EOF is determined to be functionally operable.

The inventory of extension cords required to support equipment identified in Attachment 4 will be maintained by incorporating them in SR/O/B/4600/086, Standard Procedure For Periodic Verification Of EOF Communication Equipment Operation And Equipment/Supply Inventory.

Equipment requiring use of extension cords identified in Attachment 4 will be incorporated in EP Functional Area Manual (FAM) Section 3.8, EOF Data Coordinator Reference Manual. SR/O/B/2000/003, Activation Of The Emergency Operations Facility, Enclosure 4.17, EOF Emergency Planner Checklist, will incorporate a new step that includes the following or equivalent statement: "If backup power is being supplied to the EOF, then refer to EP FAM Section 3.8 for additional guidance on supplying power to identified EOF Equipment."

7. In response to RAI-36 the licensee states, "If the decision is made to send the site team to Oconee Nuclear Station, then accommodations would be made on a case by case basis." Discuss what accommodations/contingencies have been identified/considered and will ERO members be trained to accommodate a request to be located to the site.

If the decision is made to augment NRC response by sending a site team to Oconee Nuclear Site, then the legacy EOF located in Clemson, SC, would continue to serve this function as long as Duke Power retains ownership. This facility was designed, in accordance with NUREG 0696, to accommodate the site's EOF responders as well as State, FEMA, and the NRC's site team during an emergency event. The equipment (furniture/phones/HVAC) necessary to support at least 10 members of the NRC's site team would continue to be maintained for this purpose. This would also include ENS, HPN, RSCL, OCL, PMCL, and MCL phones. The legacy EOF is also the location of the Oconee JIC. At this location, NRC personnel would have access to Public Information Officers from Duke Power, SC State, Oconee and Pickens Counties, as well as TV, radio, and newspapers.

The capabilities of the legacy EOF will be maintained for the foreseeable future. If a future decision is made to sell this facility or otherwise render it unsuitable for NRC use, then an equivalent facility would be provided for the response of additional NRC personnel.

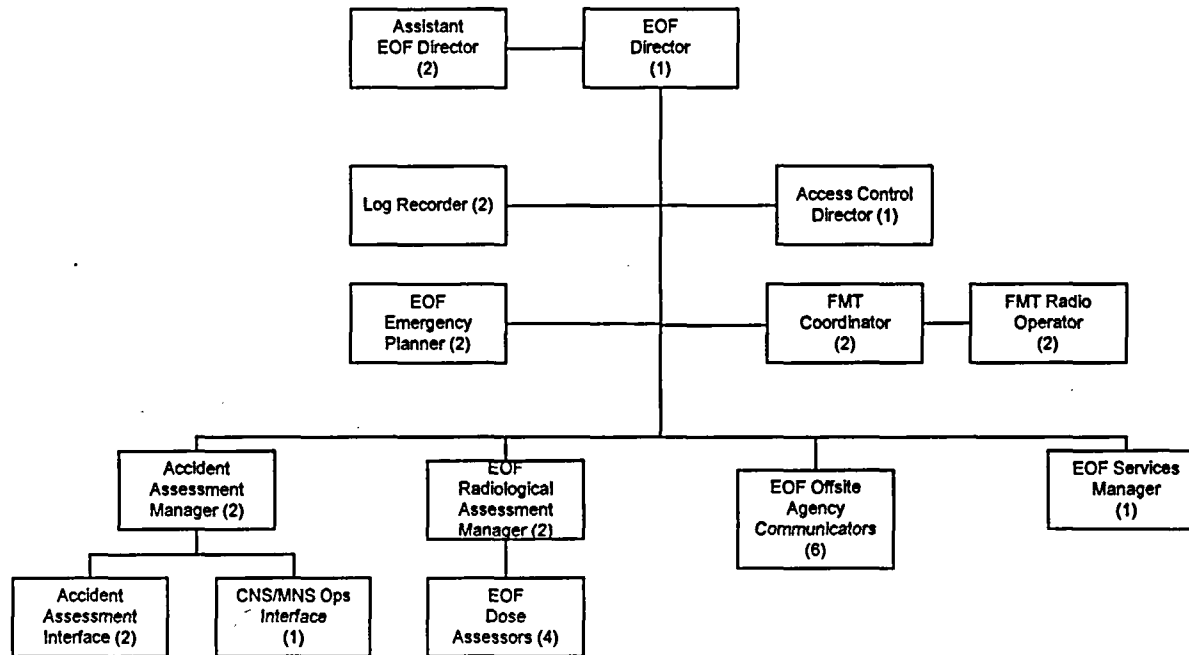
The EOF would inform the TSC of the decision to augment the NRC response to the site. The TSC would be responsible for accommodating this request. Currently, the TSC NRC Communicator is tasked with facilitating the response of NRC personnel to the site.



TRAINING SUMMARY NUMBER	COURSE DESCRIPTION
HS0537	Emergency Plan Exercise/Drill
HS0556	Severe Accident Management Guideline (SAMG) Annual Drill
TTN386	ERO Training for non-badged individuals (GO Personnel at EOF)
TTN366	FFD Training for non-badged individuals (GO Personnel at EOF)
OC7227	Severe Accident Management Guideline (SAMG) Introduction & Overview
OC7228	Severe Accident Assessment & Mitigation
OC7229	Severe Accident Management Guideline (SAMG) CBT
OC7231	Severe Accident Management Guideline - Table Top Drill
UA0LII	Initial Radiation Worker Training
UALIIB	Radiation Worker Training Bypass
TTC135	Notification of States and Counties from the Emergency Operations Facility (SR/0/B/2000/004) - review of procedure changes
TTC136	Common EOF Overview; ONS Meteorology; Activation of the Emergency Operations Facility (SR/0/B/2000/003) - review of procedure changes
TTC137	Common EOF Overview; ONS Meteorology; Activation of the Emergency Operations Facility (SR/0/B/2000/003) - review of procedure changes; Field Monitoring Coordinator (SH/0/B/2005/002) - review of procedure changes; Oconee Environmental Monitoring for Emergency Conditions (RPSM 11.7)
TTC138	Common EOF Overview; Oconee Systems Overview; Oconee specific release rate variables, pathways, dose calculations; ONS Meteorology; Activation of the Emergency Operations Facility (SR/0/B/2000/003) - review of procedure changes; ONS Emergency Classification (RP/0/B/1000/001) - review of procedure; SH/0/B/2005/001 - review of procedure changes; Field Monitoring Coordinator (SH/0/B/2005/002) - review of procedure changes; HP/0/B/1009/018 - review of procedure; review of RPSM 11.1 and 11.3
TTC139	Common EOF Overview; Oconee Systems Overview; Activation of the Emergency Operations Facility (SR/0/B/2000/003) - review of procedure changes; ONS Emergency Classification (RP/0/B/1000/001) - review of procedure
TTC140	Common EOF Overview; Oconee Systems Overview; Activation of the Emergency Operations Facility (SR/0/B/2000/003) - review of procedure changes; ONS Emergency Classification (RP/0/B/1000/001) - review of procedure
TTN213	Emergency Operations Facility (EOF) Facility Specific Training
TTN214	EOF Emergency Planner Position
TTN217	EOF Log Recorder Position Specific
TTN388	Initial EOF Offsite Agency Communicator
TTN390	TSC/EOF Dose Assessor Position
TTN391	Initial EOF Director Position
TTN392	EOF Field Monitoring Coordinator
TTN393	EOF Radio Operator Position Specific
MC3077	Position Specific Accident Assessment Manager
MC3090	EOF Radiological Assessment Manager Position Specific
MC3092	EOF Accident Assessment Interface Position Specific

**FIGURE B-11  
DUKE ENERGY COMPANY  
OCONEE NUCLEAR SITE**

**Common EOF  
Multi-Site Event Staffing**



1. Pagers activated for second unit - all call response
2. Assistant EOF Director assumes responsibility as lead manager for designated site
3. Additional Log Keeper retained to support 2<sup>nd</sup> Site
4. Additional Accident Assessment Manager retained to support 2<sup>nd</sup> Site
5. Additional Dose Assessor retained to support 2<sup>nd</sup> Site
6. Additional FMT Coordinator retained to support 2<sup>nd</sup> Site
7. Additional FMT Radio Operator retained to support 2<sup>nd</sup> Site
8. Four additional Offsite Communicators as needed to support both sites
9. Additional Emergency Planner as needed to support 2<sup>nd</sup> Site
10. Additional Radiological Assessment Manager as needed to support 2<sup>nd</sup> Site
11. Additional Assistant EOF Director as needed to support 2<sup>nd</sup> Site
12. Oconee Ops Interface position is staffed in the ONS TSC
13. Additional Accident Assessment Interface as needed to support 2<sup>nd</sup> Site

**DRAFT**

## H. EMERGENCY FACILITIES AND EQUIPMENT (Continued)

### H.2 Emergency Operations Facility

The Emergency Operations Facility (EOF) is located in the Power Building which is part of the Charlotte General Office in North Carolina. The facility is located approximately 120 miles from the Oconee Nuclear Site. See Figures H3A thru H3-E.

Two utility circuits feed the Power Building where the EOF is located. Primary power to the Power Building is provided by commercial power. Backup power is provided by two Diesel Generators. These generators provide backup power for life safety, telecommunications loads, and the orange electrical outlets that are in the EOF. The swap to the Diesel Generators is an auto swap. 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.

## PCs and Backup Power

PC	Primary Application	Backup Power desired?
EOF Log keeper	Autolog (Log keeper)	Yes – Could keep typed log on Microsoft Word stand alone
* EOF Emergency Planner and Extron Box	Autolog (For display purposes)	No – Projectors not on backup power
Accident Assessment Manager	OAC/SDS	No – Not useful without LAN connectivity for Data Transmittal
Rad Assess. Mgr.	RADDOSE V	Yes – could serve as backup to Dose Assessor PC
Public Affairs	Microsoft Word (News Releases)	Yes – could type on Microsoft Word stand alone; could not send documents to JIC through LAN, but could send via Fax
* Accident Assessment # 1 and Extron Box	OAC/SDS	Already on backup power – Could use PC for Excel spreadsheets (e.g. Boil off or Ice Melt Calcs)
* Accident Assessment # 2 and Extron Box	OAC/SDS	No – Not useful without LAN connectivity for Data Transmittal
* Data Coordinator PC #1 and Extron Box	Various	No – Not useful without LAN connectivity for Data Transmittal
* Data Coordinator PC #2 and Extron Box	Various	No – Not useful without LAN connectivity for Data Transmittal
* Dose Assessor RADDOSE V and Extron Box	RADDOSE V	Yes – Run Raddose Stand alone. Could use Parallel cable to give local printing capability.
* Dose Assessor and Extron Box	OAC/SDS	No – Not useful without LAN connectivity for Data Transmittal
Dose Assessor Dual Site Spare <sup>1</sup>	RADDOSE V	No – Not unless local printer installed
Dose Assessor Dual Site Spare and Hub	OAC/SDS	No – Not useful without LAN connectivity for Data Transmittal
Offsite Monitoring	Various (Met Data)	No – Not useful without LAN connectivity

<sup>2</sup> NIT has installed 2 PCs permanently in Dose Assessor Area for Dual Site event use rather than committing Laptops, since this is where the need is greatest.

\* Display projectors not on backup power. Extron Switching Equipment is, as are some Data Monitors.

RAI ATTACHMENT 5  
Charlotte EOF Relocation Plans

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Duke Energy Corporation (Duke) submitted a request on December 18, 2003, that an exception be granted to the Emergency Operations Facility (EOF) location requirements contained in NUREG-0696 for Oconee Nuclear Station. Shortly after this submittal, Emergency Planning was informed by Duke Energy Corporate Real Estate Services (CRES) that Duke Energy would be vacating the Power Building, where the existing EOF is located, by March 2006. CRES' goal is to relocate the Emergency Operations Facility from the Power Building by the end of 2005.

In February 2004, the decision was made that the new location for the EOF would be in Duke Energy's Energy Center at 526 South Church Street, Charlotte, North Carolina. The Energy Center is located across the street from the Power Building, and is also the current location of the Joint Information Center (JIC) for McGuire and Catawba Nuclear stations. The room arrangement for the new EOF was approved by Duke Power management in October 2004. The size of the new EOF is approximately 7,414 square feet. This is equivalent to the existing location in the Power Building. Detailed design work is currently in progress. The facility is being designed in light of the requirements of NUREG-0696, with the intent of being equivalent to or better than the existing EOF in terms of equipment and function. The proposed EOF relocation does not alter the basic functions of the EOF and will not affect EOF staffing or training. Equipment from the Power Building EOF for the acquisition, display, and evaluation of radiological, meteorological, and plant system data used to determine offsite protective measures/plant status will be relocated to the new facility. The plant records, including emergency response procedures and plans, currently stored in the Power Building EOF will also be relocated to the EOF in the Energy Center. The following equipment located in the Power Building EOF will be relocated to the new facility in the Energy Center:

- Desks/tables
- Phones
- Computers
- Projection Systems
- Status Boards
- Maps
- Sign-In Boards
- Satellite Clocks
- Video Display Systems controllers/switches
- Communications Equipment (identified in earlier submittals and observed during the dual-site drill on March 23, 2005):
  - Duke Telephone System
  - Selective Signaling System (state/county notifications)
  - Decision Line (discussion/coordination of PARs)
  - Commercial Phones from Charlotte Switch Network
  - Field Monitoring Team Radios
  - North Carolina State Satellite Radio
  - South Carolina Local Government Radio
  - NRC Emergency Telecommunications System Phones
  - Telecopiers

Once the move to the new facility is completed, all equipment will be tested for operability in accordance with existing test procedures. The facility will not be declared operational until this testing is completed satisfactorily. During the transition, contingencies have been established to

## ATTACHMENT 2

### ADDITIONAL COMPUTER RESOURCES TO SUPPORT A MULTI-SITE EVENT

The following information in this attachment provides draft procedure statements to address the use of additional computer resources to support a multi-site event.

## ATTACHMENT 2

### Additional Computer Resources to support a Multi-Site Event

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The demonstration drill conducted on March 23, 2005 identified the need for additional computer resources to support a multi-site event. Specific areas needing additional computer resources include the following: Accident Assessment Manager, Radiological Assessment Manager, and Public Affairs.

To support the need for additional computers for the Accident and Radiological Assessment Managers, the following (or equivalent step) will be added to Enclosure 4.19, EOF Data Coordinator Checklist, of SR/O/B/2000/003, Activation of the Emergency Operations Facility:

\_\_\_\_\_ **IF** another site declares an emergency requiring activation of the EOF for support, acquire two additional computers (laptop or PC) within one hour for use by the Accident Assessment Manager and the Radiological Assessment Manager.

To support the need for additional computers for Public Affairs, the following (or equivalent) Note will be added to Enclosure 4.3, Public Information Coordinator Activation Checklist, of SR/O/B/2000/001, Standard Procedure For Public Affairs Response To The Emergency Operations Facility:

**NOTE:** If additional computers are needed to support public affairs EOF response, contact the Admin & Logistics Manager (704-382-0548) in the JIC to request additional computers be sent to the EOF.