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Chief, Rulemaking, Announcements and Directives Branch (RDB)
Division of Administrative Services
Office of Administration
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Docket ID NRC-2010-0080
Duke Energy Carolinas, LLC (Duke Energy)
Comments on Draft "NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, Guidance
for Protective Action Recommendations for General Emergencies"

Duke Energy has reviewed the above document referenced in the Federal Register notice published on March 8, 2010 (75 FR 10524) concerning Draft NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3.

Duke Energy appreciates being given an opportunity to comment on these matters and endorses the comments submitted by the Nuclear Energy Institute by letter dated June 8, 2010 (ML101610629). Duke Energy also provides the additional attached comments.

If you have any questions, please contact L. B. Jones at 704-382-4753.

Sincerely,

R. Michael Glover

Mike Glover

Attachment

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**Duke Energy Comments on
Draft NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3
Federal Register Notice of March 8, 2010 (75 FR 10524)**

1. The proposed guidance in NUREG-0654 Supplement 3 and PAR Logic Diagram needs to be more clear as to which decisions are to be made during the planning phase and which decisions are to be made during event response.
2. The regulatory change process licensees should use to revise Emergency Plans are not included this new Federal Guidance. That regulatory change process should be included.
3. Duke Energy is requesting final implementation of Supplement 3 be completed after Evacuation Time Estimates (ETE) are updated since the PAR Logic Diagram requires data not available in current ETEs.
4. The guidance discusses how to handle impediments to evacuation, but does not consider the case where Sheltering in Place (SIP) could be more hazardous due to extreme weather conditions (e.g., heat or cold). This needs to be considered in the guidance.
5. The logic diagram has a branch which says, "GE conditions remain?" with the answer "No," which goes to a box that says, "Expand PAR only to areas where PAGs could be exceeded." By the approved generic Emergency Action Level schemes, if PAGs could be exceeded at or beyond the Site Boundary, the plant should be in a General Emergency. This branch should be removed.
6. The guidance mentions that evacuation traffic will be directed by local authorities staffing traffic control points. Some offsite plans do not use traffic control points, but rather use EPZ access control points while allowing "free flow" of traffic exiting the EPZ. The guidance needs to allow for this option.