

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8310280124 DOC. DATE: 83/10/25 NOTARIZED: NO  
 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co.  
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co.  
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.

DOCKET #  
 05000269  
 05000270  
 05000287

AUTH. NAME: TUCKER, H. B.  
 AUTHOR AFFILIATION: Duke Power Co.  
 RECIP. NAME: DENTON, H. R.  
 RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director  
 STOLZ, J. F. Operating Reactors Branch 4

SUBJECT: Suppls 830603 ltr re exemption request from location requirements of emergency operations facility. Significant benefits not achieved by near-site facility up to 20 miles from plant. Meeting w/NRC requested.

DISTRIBUTION CODE: A0455 COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2  
 TITLE: OR Submittal Emergency Prep Correspondence

NOTES: AEOD/Ornstein:icy. 05000269  
 AEOD/Ornstein:icy. 05000270  
 AEOD/Ornstein:icy. 05000287

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	NRR ORB4 BC	1	SUERMANN, J 01	1
INTERNAL:	IE/DEPER/EPB 06	2	IE/DEPER/IRB 12	1
	NRR/DSI/RAB	1	REG FILES 04	1
	RGN2	1		
EXTERNAL:	LPDR 03	1	NRC PDR 02	1
	NTIS 05	1		
NOTES:		1		

TOTAL NUMBER OF COPIES REQUIRED: LTR 12 ENCL 0

# DUKE POWER COMPANY

P.O. BOX 33189  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

October 25, 1983

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287

Dear Sir:

This letter supplements my letter of June 3, 1983 regarding an exemption request to the location requirements of the Emergency Operations Facility (EOF) for Oconee Nuclear Station. On September 6, 1983 Duke representatives met with the NRC Staff to further explain our plan and to receive Staff feedback. We would like to reiterate the points made at that meeting.

First, we believe that Duke Power is unique in the industry. Unlike most utilities, Duke has its staff with nuclear design and analysis capability in one location outside the plant, that being in the Charlotte General Office. Further, Duke's management and main public information staff are located there. Thus, the key personnel with the necessary expertise to support the station's needs are located in one area during normal day-to-day activities and, during an emergency, would be readily available to perform to support the station personnel from that location in Charlotte. Secondly, Oconee is located on the very western edge of the Duke service area. It is in a relatively remote location. Access to the area by car requires about three hours. Access to the area by plane would take just as long, as pilot and plane availability are limited, and landings at the nearest airport, Clemson, are not possible after dark. Third, existing Duke facilities within 20 miles of Oconee, of sufficient size and layout to accommodate the Crisis Management Team, are limited to the Oconee Training Center/Visitors' Center Complex. However, this complex does not meet the habitability requirements for being within 10 miles of the plant. It was due consideration of the above factors that led Duke to propose an EOF location that is functionally equivalent to the Staff position on locating the EOF within 20 miles, but is located at the Charlotte General Office.

The proposed EOF utilizes existing Duke resources in Charlotte and we consider that it provides the most effective means to perform the functions of the EOF. As noted during our September 6, 1983 meeting, the Public Information function, including the Public Spokesperson, will be performed near-site and is not part of the exemption request. The proposed Charlotte EOF is capable of providing timely support for Oconee as all EOF personnel live within relatively short commuting distance; excellent communications exist through multiple networks as described during the meeting; and there is rapid access to additional resources that are normally available in day-to-day activities but that would not be available to a near-site EOF.

8310280124 831025  
PDR ADOCK 05000269  
F PDR

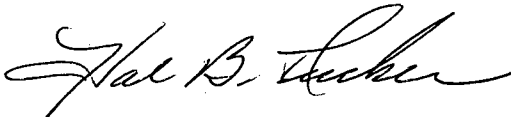
A045  
1/0

Mr. Harold R. Denton, Director  
October 25, 1983  
Page 2

Duke does not believe that a significant benefit is achieved by a near-site EOF, at up to 20 miles from Oconee, over and above that provided by the proposed Charlotte EOF. In fact, there may be a decrease in safety benefit solely by the fact that communications and resources at the near-site EOF immediately after the start of an emergency would be limited in a time-frame when they are most needed. It should be noted that Duke fully plans that once the recovery phase is initiated, Duke resources would be located near-site to conduct the necessary activities and it is only during the emergency phase that the exemption request is applicable.

Duke understands that this item is under active Staff review and requests that the Staff decision and its bases be provided when available but prior to final Commission action. In the event our request for exemption is not approved by the Staff, Duke requests a meeting at either the Office Director or Commission level in order to discuss the bases of the Staff decision.

Very truly yours,



Hal B. Tucker

RLG/php

cc: Mr. James P. O'Reilly, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Mr. John F. Suermann  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. J. C. Bryant  
NRC Resident Inspector  
Oconee Nuclear Station