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50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.

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05000287

AUTH.NAME AUTHOR AFFILIATION
HAMPTON, J.W. Duke Power Co.
RECIP.NAME RECIPIENT AFFILIATION
Region 2 (Post 820201)

SUBJECT: Requests exemption for demonstration of after hours exercise during 1996 Annual Exercise, based on listed info.

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DUKE POWER

January 28, 1996

Chief, Emergency Preparedness Section
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Subject: Oconee Nuclear Site
1996 Exercise - After Hours Exercise Exemption
Request
Docket Nos. 50-269, 50-270, and 50-287

Dear Sir:

Oconee Nuclear Site requests an exemption for demonstration of an after hours exercise during the 1996 Annual Exercise. This request is based on the following:

- 1) South Carolina has requested and received accreditation for REP Exercise Objectives from FEMA for demonstration of this objective by the state and local government agencies due to actual response (see attachments).

During the week of August 15, 1994, Oconee and Pickens County EOCs were activated after hours in response to flooding due to heavy rain resulting from Tropical Storm Beryl. This activation met the demonstration provisions described in FEMA REP 14 for Objective 30 (Continuous, 24 Hour Staffing), Objective 32 (Unannounced Exercise or Drill), and Objective 33 (Off-hours Exercise or Drill). This request was submitted to FEMA in October, 1994. Therefore, it is the

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state's intention not to conduct an after hours exercise in 1996. Without state and local government agency participation, Oconee will not be able to demonstrate this objective during the 1996 Annual Exercise.

- 2) Oconee's demonstrated history of performance related to after hours activation drills.

In response to Exercise Weakness 50-269, 270, 287/90-26-01, Failure to staff and activate the TSC within 45 minutes as stated in the Oconee Emergency Plan, Oconee management committed to the following:

- a) Implementing enhancements in the recall of emergency response personnel to the site.

Initially enhancements, including use of duty pagers programmed with an emergency response group call number, were made to the notification process for duty personnel who provide immediate support to the TSC/OSC. In 1995, as a further enhancement, digital pagers with improved reception capability were provided to applicable emergency response personnel.

Also, since the initial commitment, a vendor service (Community Alert Network) has been utilized to notify additional emergency responders. Using a database listing of emergency response personnel for Oconee, this service will notify a minimum number of personnel for identified emergency response positions.

The pager system and vendor service are tested with each after hours activation drill conducted by Oconee Nuclear Site.

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- b) Offsite pagers used for recall of emergency response personnel are tested weekly.

Offsite pagers for duty personnel who are emergency responders are tested weekly after hours. This test requires duty personnel to contact the site after their pagers have been activated. The results are documented by an approved test procedure. Problems with pager response are documented and corrected as soon as possible.

- c) TSC activation drills were conducted in November and December, 1990 and January, 1991. In addition, during 1991, an activation drill was conducted each quarter. Beginning in 1992, emergency response facility activation drills have been conducted semi-annually.

Unannounced activation drills, to test the process used to activate the emergency response organization and activation response times, have been conducted on the following dates: 11/90; 12/90; 01/10/91; 05/16/91; 09/27/91; 11/23/91; 04/21/92; 11/10/92; 04/13/93; 12/06/93; 06/27/94; 12/01/94; 07/27/95; and, 12/18/95.

During 1990 - 1991, these drills required emergency response personnel to report to their assigned emergency response facility. Response times were observed with no major problems identified with satisfying ONS Emergency Plan requirements.

The drills conducted during 1992 and on 04/13/93 were full integrated quarterly drills, similar to annual exercises, that tested the major components of the ONS Emergency Plan.

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Due to scheduling constraints, the drills conducted since 12/06/93 have not been on the scale of the quarterly drills. However, these drills continued to test the following major components of the ONS Emergency Plan:

- Emergency Classification
- Notification To Offsite Agencies (State/County/Federal)
- Emergency Response Organization (Activation, Staffing, Turnover between the Control Room/TSC and TSC/EOF)
- Communications
- Site Assembly/Access Control
- Emergency Equipment And Supplies
- Field Monitoring/Plume Tracking/Offsite Dose Calculations (Mobilization of Field Monitoring Teams and Data Transmission)
- Accident Assessment/Mitigation

3) Continued after hours activation drills.

Oconee Nuclear Site is committed to conducting unannounced after hours activation drills.

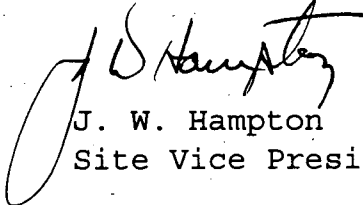
Demonstration of the major components of the ONS Emergency Plan, as listed in the above paragraph, will continue to be the major objective of these drills.

Due to the number and type of after hours activation drills conducted at Oconee Nuclear Site, it is our position that Oconee has satisfied the requirements for an after hours activation exercise as identified in NUREG 0654. We further propose that the after hours activation drill conducted on 12/01/94 satisfies demonstration of this objective during a six year time frame. This would enable Oconee Nuclear Site to be in the same six year window as SC State, Oconee County, and Pickens County. Demonstration of an after hours exercise would then be required during the 2000 Annual Exercise.

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Thank you for your prompt attention to this request. If you have questions or comments, please contact Coleman Jennings at (864)885-3294.

Sincerely,



J. W. Hampton
Site Vice President

Attachment

xc: Ed Burchfield
Bob Duggleby
Bill Huckins

**The State of South Carolina
Military Department**



OFFICE OF THE ADJUTANT GENERAL

October 4, 1994

**T. ESTON MARCHANT
MAJOR GENERAL
THE ADJUTANT GENERAL**

Ms. Mary Lynne Miller, Acting Chief
Training Exercise and Evaluation Branch
FEMA Region IV
1371 Peachtree Street, NE, Suite 700
Atlanta, GA 30309

Subject: Request for Accreditation for REP Exercise Objectives Due to Actual Response, Pickens County, SC.

Dear Ms. Miller:

I respectfully request accreditation for FEMA REP 14, Objective 30 (Continuous, 24 Hour Staffing) Objective 32 (Unannounced Exercise or Drill) and Objective 33 (Off-hours Exercise or Drill) for actual response to flooding during the period of August 16-18, 1994.

Pickens County, South Carolina met all demonstration provisions described in FEMA REP 14, September, 1991.

The following supportive information is submitted:

1. Type of Emergency: Natural hazard, flooding.
2. Time of Response: From August 17, 1994, 1330 hours to August 18, 1994, 1500 hours.
3. Time Local Staff Arrived at EOC: 0130 hours.
4. List of Involved Agencies and Personnel: See attached FEMA Form 95-44, Part IV.
5. Communications Log: See attached Radio Log, actual log is a tape recording.
6. Involved Jurisdictions - Pickens County and the State Emergency Operations Center.

Emergency Preparedness Division
Rutledge Building 1429 Senate Street
Columbia, South Carolina 29201 (803) 734-8020
Fax (803) 734-8062

Ms. Mary Lynne Miller

October 4, 1994

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7. **Emergency Decisions Made and Implemented:**

- To activate the Pickens County EOC
- To evacuate individuals by boat from mobile home and van
- To install barricades to block flooded roadways
- To notify the American Red Cross
- To utilize the American Red Cross for a windshield survey

8. **Resources Used: See FEMA Form 95-44, Part I, Section 9**

Pickens County provided:

- Vehicles
- Emergency Medical Services
- Backhoe
- Bulldozers
- Rescue Boat
- County-wide radio net

Duke Power Company provided:

- Four vehicles
- Chain saws
- Shredders

For further information, contact Bill Huckins by calling (803) 734-8020.

Your consideration and approval of this request is appreciated.

Sincerely,


Stan M. McKinney
Director

SMM:BH

**The State of South Carolina
Military Department**



OFFICE OF THE ADJUTANT GENERAL

October 4, 1994

**T. ESTON MARCHANT
MAJOR GENERAL
THE ADJUTANT GENERAL**

Ms. Mary Lynne Miller, Acting Chief
Training Exercise and Evaluation Branch
FEMA Region IV
1371 Peachtree Street, NE, Suite 700
Atlanta, GA 30309

Subject: Request for Accreditation for REP Exercise Objectives Due to Actual Response, Oconee County, SC.

Dear Ms. Miller:

I respectfully request accreditation for FEMA REP 14, Objective 30 (Continuous, 24 Hour Staffing), Objective 32 (Unannounced Exercise or Drill) and Objective 33 (Off-hours Exercise or Drill) for actual response to city water pollution and flooding during the period of August 15-17, 1994.

Oconee County, South Carolina met all demonstration provisions described in FEMA REP 14, September, 1991, through responses to two events, Westminster city water pollution with the activation of the Alternate Oconee County Emergency Operations Center, and general flooding of Oconee County with the concurrent opening of the County Emergency Operations Center.

The following supportive information is submitted:

1. Type of Emergency: Natural hazard, flooding.
2. Time of Response: From August 15, 1994, 2315 hours to August 20, 1994, 1600 hours.
3. Time Local Staff Arrived at AEOC: August 16, 1994; 0915 hours.
4. Time Local Staff Arrived at EOC: August 16, 1994, 2230 hours.
5. List of Involved Agencies and Personnel: See attached FEMA Form 95-44, Part IV and letter from Oconee County Emergency Preparedness Agency, September 9, 1994.

**Emergency Preparedness Division
Rutledge Building 1429 Senate Street
Columbia, South Carolina 29201 (803) 734-8020
Fax (803) 734-8062**

Ms. Mary Lynne Miller

October 5, 1994

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6. Communications Log: See attached letter, actual log is a tape recording.
7. Involved Jurisdictions - Oconee County.
8. Emergency Decisions Made and Implemented:
 - To activate the Oconee County Alternate EOC, Westminster, SC.
 - To evacuate individuals by boat from mobile home and van.
 - To utilize SCARNG personnel and equipment to establish two water points.
 - To activate the County EOC.
 - To activate ARC personnel.
 - To evacuate and shelter 10 personnel.
 - To issue flood advisories.
 - To dispatch rescue squad.
9. Resources Used: See FEMA Form 95-44, Part I, Section 9
 - SCARNG provided two potable water points for Oconee County.
 - SCARNG provided eight 2½ ton trucks w/ water trailers.
 - City of Westminster provided meals for SCARNG personnel.
 - SCARNG provided helicopter for overflight of Oconee County.
 - Oconee County provided an activity bus to transport rescues.
 - Oconee County provided roadwork crews.

For further information, please contact Bill Huckins by calling (803) 734-8020.

Your consideration and approval of this request is appreciated.

Sincerely,


Stan M. McKinney
Director

SMM:BH