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SUBJECT: Forwards request for addl info re relaxing response time for field monitoring responders from 45 to 75 minutes.Attachment 2 contains discussion of augmentation for firefighting, rescue operations,first aid & revised Table B-1.

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DUKE POWER

July 25, 1996

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

Subject: Catawba Nuclear Station
Docket Nos. 50-413, 50-414
License Nos. NPF-35, NPF-52
NRC TACs M92623, M92624
McGuire Nuclear Station
Docket Nos. 50-369, 50-370
License Nos. NPF-9, NPF-17
NRC TACs M92462, M92463
Oconee Nuclear Station
Docket Nos. 50-269, 50-270, 50-287
License Numbers NPF-38, NPF-47, NPF-55
NRC TACs M92485, M92486, M92487
Revision of Table B-1 (NUREG-0654)

Refs.: Emergency Plan Change Submittal dated May 8, 1995

Attachment 1 contains the additional information requested by Mr. Bill Meier and Dave LaBarge on June 26, 1996, regarding relaxing the response time for two field monitoring responders from 45 to 75 minutes. Attachment 2 contains a discussion of augmentation for firefighting, rescue operations and first aid and a revised Table B-1, as requested by Mr. Bill Meier on July 17, 1996. Please contact Tina Kuhr at (704) 382-3151 if there are any questions on this information.

Sincerely,

M. S. Tuckman

M. S. Tuckman
Senior Vice President, Nuclear Generation

A045

Attachments

Document Control Desk
July 25, 1996

xc:

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Attachment 1
Out of Plant Surveys

Many changes have occurred in the area of emergency classification and immediate protective actions since NUREG-0654, Rev. 1, was published. Detailed dose assessment and field monitoring data are not needed to determine immediate Protective Action Recommendations. Substantial core damage is necessary to create radiological effluents significant enough to exceed EPA Protective Action Guide levels offsite.

Of the events involving core damage, only a small percentage involve early releases. From a review of Probabilistic Risk Assessment Results, less than 3% of internal core damage event frequency involves a Large Early Release. Note that PRA results define "early" as "within 5 hours." When both internal and external events are considered, about 8% of the total core damage frequency involves a large early release for Catawba, with less for the other two sites. This information was derived from the IPE submittals.

Core damage can be clearly detected and determined in the control room. Core damage is only one of several indications upon which a General Emergency Classification is based. Duke Power has implemented guidance (effective 1/1/94 for McGuire and Catawba, in 1992 for Oconee) similar to that in the NRC's Response Technical Manual (NUREG/BR-0150). This has significantly increased the conservatism in our protective action recommendations over previous guidance based upon Information Notice 83-28.

Upon entry into a General Emergency classification, our plants will recommend evacuation of the 2-mile radius and 5-mile downwind sectors, and recommend that the remainder of the 10-mile EPZ be sheltered. For wind speeds less than 5 miles per hour, all sectors are considered to be downwind, and the Operations Shift Manager/Emergency Coordinator would recommend evacuation of the 5-mile radius. Due to the complex meteorology at Oconee, the Operations Shift Manager/ Emergency Coordinator would always recommend evacuation of the 5-mile radius, with the remainder of the EPZ to be sheltered. Real time meteorological information (wind speed/wind direction) is available in the control room.

Field monitoring data is used to confirm dose assessment or provide indication of an unmonitored release. Information has been provided earlier about staff augmentation in the area of dose assessment. Field monitoring up to the protected area fence is performed by RP techs on shift. If activity is detected out of plant, it is assumed that the activity is beyond the fence also. That then becomes the information for the Emergency Coordinator to use in Emergency Classification (e.g. indication of loss of the containment barrier) and for the guidance of offsite surveys when they are available in 75 minutes.

In addition, our agreement with the states and counties is that we are only required to indicate whether or not the event involves a release on the initial notification message. Detailed dose information is provided as it becomes available.

Attachment 2
Local Support Response

Duke Power is revising the Proposed Table B-1 in the area of augmentation for Firefighting and Rescue Operations and First Aid. (See revised Table B-1 on next page.) Augmentation for firefighting, rescue operations, and first aid is provided by local support. As soon as the need for local support is recognized, the request for resources is made. The local support agencies respond in accordance with existing letters of agreement. Response is expected to occur similar to any other industrial facility. Our on shift capabilities in these areas are described below.

Firefighting

Duke Nuclear Sites are required to staff a five member fire brigade per Design Basis Documents. Current company policy provides additional members of the fire brigade beyond those required. The additional members of the fire brigade have their priorities determined by the Operations Support Center. This fire brigade is required to be self sufficient within Nuclear Safety Related areas by NRC regulations. The Duke Power fire brigades are trained as interior structural fire fighters. Sufficient equipment is provided to attack any anticipated fires within these areas. The local support fire departments provide a secondary line of defense.

Rescue Operations and First Aid

Duke Powers' sites provide on shift resources trained to the DOT first responder level and trained in rescue operations. These personnel have been trained in confined space rescue and rope rescue. The on shift resources have been provided to be self sufficient in rescue and first aid operation to provide care to the patient within the critical first hour.

TABLE B-1 (PROPOSED)
DUKE POWER COMPANY
MINIMUM STAFFING LEVELS

MAJOR FUNCTIONAL AREA	MAJOR TASKS	POSITION TITLE OR EXPERTISE	ON SHIFT*	CAPABILITY FOR ADDITIONS WITHIN 75 MINUTES
Plant Operations and Assessment of Operational Aspects		Unit Supv. (SRO) Control Room SRO Control Room Operators Nuc. Equip. Operators	1 1 2 2	
Emergency Direction and Control (Emergency Coordinator)		Operations Shift Manger Station Manager	1	 1
Notification/ Communication	Notify Company Personnel, State, County, Federal Agencies and Maintain Communication	Offsite Communicator	1**	2
Emergency Operations Facility (EOF) Radiological Accident Assessment and Support	EOF Director Dose Assessment Plant Status Access Control Communications Offsite Surveys	Senior Manager Rad. Assessment Manager Ops. Interface Manager (ONS) Accdt. Assmt. Mgr. (CNS&MNS) Access Control Offsite Communications FMT Members (2 Teams)		1 1*** 1 1**** 1 2 4
Radiological Support and Protective Actions	RP Coverage for Repair/Corrective Actions Count Room Search & Rescue Contaminated Injury Medical Response Firefighting Out of plant surveys Inplant surveys	RP Technicians Computer Program until TSC activated	2	10
	Chem/Radwaste Operations	Chemistry Technician Radwaste Operator	1	 1
Plant System Engineering, Repair and Corrective Actions	Technical Support	Shift Manager (STA) Core/Thermal Hydraulics Electrical Engineering Mechanical Engineering	1 **	1**** 1 1
	Repair and Corrective Actions	Mechanical Maintenance I&E Technician	1 2	1 2
Firefighting	—	Fire Brigade	Per DBD	†
Rescue Operations and First-Aid	—	MERT Team	2**	†
Site Access Control and Personnel Accountability	Security, Personnel Accountability	Security Personnel	All Per Security Plan	–

TABLE B-1 (PROPOSED)
DUKE POWER COMPANY
MINIMUM STAFFING LEVELS

The 75 minute clock begins at the time of the initial Emergency Classification. The TSC/OSC are required to be activated within the same time. The EOF must be operational within 75 minutes of the Emergency Declaration. All facilities are required to be activated at an Alert or Higher Classification.

* For each unaffected nuclear unit in operation, at least one unit supervisor, one control room operator, and one non-licensed operator should be maintained. For units sharing a control room, the unit supervisor may be shared between units if all functions are covered.

** Provided by shift personnel assigned other responsibilities

- Operations personnel from unaffected units serve as a communicator to the offsite agencies and the NRC.
- Shift Work Control Manager serving as the STA performs core thermal-hydraulic evaluations.

*** Rad. Assessment Manager in the EOF will be responsible for providing assistance to the TSC for dose assessment.

**** Accident Assessment Manager in the Catawba & McGuire EOF will provide additional support to the Technical Support Center in the area of core thermal hydraulics within 75 minutes. Oconee utilizes a Nuclear Engineer in the TSC to provide the support within 75 minutes.

† Augmentation in these areas is provided by local support. The local support agencies respond in accordance with existing letters of agreement. Response is expected to occur similar to any other industrial facility.