

August 3, 2016

Vanessa Quinn, Chief
Radiological Emergency Preparedness Branch
Technological Hazards Division
Federal Emergency Management Agency
1800 South Bell Street
Arlington, VA 20598-3025

SUBJECT: DUKE ENERGY REQUEST FOR FURTHER EMERGENCY OPERATIONS
FACILITY CONSOLIDATION

Dear Ms. Quinn:

By letter dated April 29, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16120A076), Duke Energy requested a license amendment to, amongst other changes¹, consolidate the Emergency Operations Facilities (EOFs) for Brunswick Steam Electric Plant - Unit Nos. 1 and 2 (BSEP), Shearon Harris Nuclear Power Plant - Unit 1 (HNP), and H. B. Robinson Steam Electric Plant, Unit No. 2 (RNP) with the existing Duke Energy Corporate Emergency Operations Facility (hereafter referred to as the Duke Charlotte EOF). The existing EOFs for BSEP and RNP are onsite, and the existing EOF for HNP is in the Harris Energy and Environmental Center approximately two miles (straight line distance) from the HNP site. The Duke Charlotte EOF is currently located in the Duke Energy Center at 526 South Church Street in Charlotte, North Carolina (NC), and already serves as the consolidated EOF for Catawba Nuclear Station - Unit Nos. 1 and 2, McGuire Nuclear Station - Unit Nos. 1 and 2, and Oconee Nuclear Station - Unit Nos. 1, 2 and 3. The BSEP, HNP and RNP site are 184 miles, 110 miles and 69 miles (straight line distance) respectively, from the Duke Charlotte EOF. Per Section IV.E.8.b to Appendix E of Part 50 to Title 10 of the *Code of Federal Regulations* (10 CFR 50), prior Commission approval is required for an EOF located more than 25 miles from a nuclear reactor site.

In Enclosure 9 to the submittal, "Offsite Response Agency Letters of Concurrence," Duke Energy provided signed letters of concurrence from the following State and local response organizations indicating that they "...concur with the proposed consolidation of the Site EOFs into the Charlotte EOF....":

- North Carolina Emergency Management

¹ In addition, Duke is requesting to change the BSEP, HNP, and RNP augmentation times to be consistent with that of the sites currently supported by the Charlotte EOF. All 30 to 45 minute (from notification) responders will change to 45 minutes (from event declaration). All 60 to 75 minute (from notification) responders will change to 75 minutes (from event declaration). They are also asking to decrease the frequency of the unannounced augmentation drill at BSEP from twice per year to once per year.

- North Carolina Department of Environment and Natural Resources (Radiation Protection Section)
- Lee County, NC
- Wake County, NC
- Brunswick County, NC
- Chatham County, NC
- Harnett County, NC
- New Hanover County, NC
- South Carolina (SC) Emergency Management Division
- South Carolina Department of Health & Environment Control (Division of Emergency Response)
- Lee County, SC
- Darlington County, SC
- Chesterfield County, SC

Per the Memorandum of Understanding Between the Department of Homeland Security / Federal Emergency Management Agency (FEMA) and U.S. Nuclear Regulatory Commission (NRC) Regarding Radiological Response, Planning and Preparedness," (ADAMS Accession No. ML15344A371) dated December 7, 2015, FEMA has responsibility for determining the adequacy of offsite radiological emergency plans and preparedness and providing its findings to the NRC. As such, I am requesting FEMA's review and initial concurrence on the proposed Duke Charlotte EOF consolidation by no later than September 30, 2016, in support of the NRC staff's development of a SECY paper for Commission approval and associated safety evaluation.

As part of the NRC's assessment of the proposed Duke Charlotte EOF consolidation, we are requesting that Duke Energy commit to conducting a drill prior to implementation, which involves supporting simultaneous events at multiple sites of differing technologies, and effectively tests the capabilities and staffing of this consolidated facility. The States of North Carolina and South Carolina will be offered an opportunity to participate in the drill to demonstrate established interfaces and coordination, and Duke Energy will provide for NRC and FEMA staff to observe the drill at the Duke Charlotte EOF. The exact date for this drill and the participating nuclear power plant sites, one of which will include a former Progress Energy site, is currently being evaluated by Duke Energy, and the NRC will coordinate this information when received with FEMA.

As always, thank you for your assistance. If you have any questions regarding the specifics of the further consolidation of the Duke Charlotte EOF, or the NRC's evaluation of these proposed changes, please contact Richard Kinard or Amanda Marshall at (301) 287-3768 and (301) 287-3677, respectively.

Sincerely,

/RA/

Joseph D. Anderson, Chief
Reactor Licensing Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

cc: A. Coons, FEMA HQ

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cc: A. Coons, FEMA HQ

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