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SUBJECT: Forwards proposed rev to Duke Power Crisis Mgt Plan, per NRC
 910304 ltr. Rev changes min staffing requirements for
 corporate emergency response & establishes goal of 75 min
 for staffing facilities during emergency.

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DUKE POWER

April 22, 1991

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

Subject: Catawba Nuclear Station
Docket Nos. 50-413, 50-414
McGuire Nuclear Station
Docket Nos. 50-369, 50-370
Oconee Nuclear Station
Docket Nos. 50-269, 50-270, 50-287
Crisis Management Center Activation

Gentlemen:

In response to your letter dated March 4, 1991, attached is a proposed revision to the Duke Power Crisis Management Plan. This revision would change the minimum staffing requirements for the corporate emergency response. It would establish a goal of 75 minutes for staffing the facilities (Charlotte and Clemson) during an emergency and identify the minimum staffing level of the CMC organization. The 75 minutes is consistent with the minimum staffing requirements previously approved for the Technical Support Centers of McGuire, Catawba and Oconee.

All three station emergency plans provide for several positions in the TSC to be staffed within 75 minutes. One of these positions is the station manager who would assume the emergency coordinator responsibilities from the shift supervisor. The Technical Support Center cannot assume responsibility for the emergency management of the incident until turnover is complete between the Shift Supervisor and the Station Manager/alternate. Using the same reasoning, the CMC could not assume responsibility for communications, emergency classification, protective actions until after the Technical Support Center was operational. The 75-minute goal for minimum staffing of the CMC is consistent with the activation time of the TSC.

To help ensure we can meet the 75-minute goal, we expect to change the facilities and procedures used for notifying CMC personnel during an emergency. When these changes are implemented, it will likely require other minor changes to the Crisis Management Plan. (For example: pagers might be activated by the station instead of by the Nuclear Production Duty Engineer.)

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April 22, 1991
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The changes to the Crisis Management Plan are proposed as a resolution to a problem identified by the NRC. Due to the significance of these changes, we request that the NRC review and approve the changes in a timely manner prior to implementation to provide stability in the change process. Contingent upon timely approval by the NRC, Duke Power will implement the changes by October 29, 1991 for all three stations.

Please contact me at 704/373-3851 or Ron Harris at 704/373-8669 if you have any questions.

Very truly yours,



M. S. Tuckman
Vice President
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REH/be(910401.002)

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**PROPOSED REVISION TO THE DUKE POWER
COMPANY CRISIS MANAGEMENT PLAN**

The attached pages are excerpts from the Crisis Management Plan which are marked to show the proposed changes.

B. On-site Emergency Organization

Planning Standard B in NUREG-0654 addresses the need for an on-site staff and Crisis Management Center (CMC) Staff capable of response in a timely manner, able to be augmented as needed, and with certain specific technical and managerial expertise.

B.1/B.2/B.3 Plant Staff Under Emergency Conditions
(See Nuclear Station Emergency Plan Section B)

B.4 Protective Action Recommendations - Emergency Coordinator/Recovery Manager

The Emergency Coordinator and Recovery Manager are the individuals responsible for making protective action recommendations to the state and county agencies. When the Crisis Management Center is operational, the Recovery Manager has sole responsibility. Prior to operation of the CMC, the Emergency Coordinator is responsible for making protective action recommendations. This responsibility may not be delegated to other members of the CMC Staff nor the station staff.

B.5 Minimum Staffing Requirements For Emergencies

see attached pages.

~~Table B-1 of NUREG-0654 addresses only one member of the CMC staff in its staffing and response time requirements. The Senior Manager of the EOF (Recovery Manager) is listed as necessary for response in 60 minutes from declaration of the emergency. As specified in the station emergency plans, the Emergency Coordinator performs the role and function of the Recovery Manager until the CMC is activated. Thus, the ability to manage the overall response effort and make Protective Action Recommendations is not compromised.~~

B.6 On-site Functional Area Interfaces During An Emergency - Description and Block Diagram

Figures B-1 and B-2 describe and specify the interfaces between and among the functional areas of emergency activity, licensee headquarters support, local services support, and state/local government response organizations. Figure B-1 is for use prior to activation of the CMC. Figure B-2 is for use after the CMC is established.

B.7 CORPORATE SUPPORT OF ON-SITE EMERGENCY ORGANIZATION

The organization identified in this section is capable of continuous (24 hours) operations for a protracted period. The individual responsible for assuring continuity of resources is the Recovery Manager. Each group's operational plan is specified in the Crisis Management Implementing Procedures.

B.5 Minimum Staffing Requirements

Upon declaration of a Site Area Emergency, or General Emergency, the CMC organization will be alerted and personnel will report to the CMC facility as soon as possible. The CMC organization is described in Section B.7. Figure B-1 shows the minimum staff required to declare the CMC operational. The CMC will be staffed using 75 minutes as a goal for the minimum staff to be in place and operational.

In addition to the minimum staff shown in Figure B-1, other personnel are expected to report to the CMC to augment the minimum staff. This augmentation would occur gradually and would range from a few minutes to a few hours depending upon the proximity of the personnel to the CMC facility.

Figure B-1

CMC ORGANIZATION - MINIMUM STAFFING REQUIREMENTS

