

October 20, 2016

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

Before the Commission

In the Matter of )  
 )  
DUKE ENERGY CAROLINAS, LLC ) Docket Nos. 52-018 and 52-019  
 )  
(William States Lee III Nuclear Station, )  
Units 1 and 2) )

**DUKE ENERGY CAROLINAS’ RESPONSE TO POST-HEARING QUESTION**

In accordance with the Commission’s Order (Transmitting Post-Hearing Questions) dated October 12, 2016, Duke Energy Carolinas, LLC (Duke Energy), submits the following response to the question posed to it by the Commission. Duke Energy has consulted with the NRC Staff and has been informed that the Staff has no objection to admitting this response as an exhibit into the record. Likewise, Duke Energy has no objection to admitting the NRC Staff’s responses as an exhibit into the record.

**Question 2:** At the hearing and in pre-hearing Questions 4 and 5, the Staff and DEC discussed the AP1000 technology training requirements for the Charlotte Emergency Operations Facility (EOF) staff.

Please provide further support for the statement at the hearing that only the EOF Director, Assistant Director, and Accident Assessment Manager are required to receive AP1000-specific training. Will the EOF Director, Assistant Director, or Accident Assessment Manager have operational experience with AP1000 units? Will any additional EOF staff also receive AP1000-specific training?

There may be event scenarios where the Technical Support Center and its personnel are unavailable to assist the EOF Director in classifying the emergency within 15 minutes, authorizing notifications to the NRC and State and local agencies, and recommending protective measures to State and local authorities.

According to Section II.B.4 of the Lee Emergency Plan, the EOF Director cannot delegate responsibility for those three tasks upon activation of the EOF. Given the need to complete those tasks in a short period of time, please discuss the adequacy of requiring only the EOF Director, Assistant Director, and Accident Assessment Manager to receive AP1000-specific training.

**Response:** The key positions of EOF Director, Assistant EOF Director, and Accident Assessment Manager will receive a broader level of AP1000-specific training considering their roles within the Emergency Response Organization (ERO) that includes training on event mitigation strategies as described in the pre-hearing Question 4 response submitted by Duke Energy. Additional Emergency Operations Facility (EOF) positions will also receive AP1000-specific training based on the results of job task analyses for EOF positions. EOF staff will receive training on the applicable characteristics of William States Lee III Nuclear Station (WLS) prior to plant operation as appropriate for their position within the EOF. This training will include instruction on the AP1000 reactor technology, plant specific Emergency Action Levels (EALs), differences in radiological and environmental characteristics of WLS, and determination of protective action recommendations for WLS. As provided in Section II.O.4 of the WLS Emergency Plan, "Duke Energy implements a program to provide position-specific emergency response training for designated members of the emergency response organization. The content of the training program is appropriate for the duties and responsibilities of the assigned position."

Some individuals qualified as EOF Director, Assistant EOF Director, and/or Accident Assessment Manager may have operational experience with AP1000 units once WLS is in operation. In addition, other ERO positions within the EOF may have experience with AP1000 units. Duke Energy corporate personnel in important groups such as Fleet Emergency Preparedness, Radiological Engineering, Safety Analysis, and Probabilistic Risk Assessment as well as other individuals with a wide range of expertise that support the AP1000 units at WLS are expected to be located at Duke Energy offices in Charlotte. These personnel would be available to be designated for EOF staff positions.

WLS COLA Part 10 Proposed License Condition 4 (Emergency Planning Actions)/WLS FSER License Condition 13-7 requires demonstration of the ability of the EOF staff to handle two site events concurrently (WLS and one additional site) prior to fuel load. Furthermore, Appendix E to 10 CFR Part 50 and EP ITAAC in Part 10 of the WLS COLA require Duke Energy to conduct a full-participation exercise to evaluate emergency response capabilities for WLS. WLS COLA Part 10, Table 3.8-1, Section 8.0 Exercises and Drills, contains numerous performance criteria for emergency response that must be satisfied to meet the ITAAC acceptance criteria. These exercises and the evaluations leading up to these exercises will demonstrate the adequacy of AP1000-specific and WLS site-specific training provided to the EOF staff.

Respectfully submitted,

/Signed electronically by David R. Lewis/

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Dated: October 20, 2016

## CERTIFICATION

I, Robert H. Kitchen, am responsible for the response to the above question. I certify that this answer was prepared by me or under my direction, and I adopt the answer as part of my sworn testimony in this proceeding. I hereby certify under penalty of perjury that the forgoing is true and complete to the best of my knowledge, information, and belief.

/Executed in Accord with 10 C.F.R. § 2.304(d)/

Robert H. Kitchen

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Dated at Charlotte, NC,  
this 20<sup>th</sup> day of October, 2016

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Duke Energy Carolinas' Response to Post-Hearing Questions, and accompanying certification of Robert H. Kitchen, have been served through the E-Filing system on the participants in the above-captioned proceeding, this 20<sup>th</sup> day of October, 2016.

/Signed electronically by David R. Lewis/

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David R. Lewis