MAR 09 1984

SERIAL: NLS-84-108

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NO. 1 - DOCKET NO. 50-400
CORPORATE EMERGENCY PLAN

Dear Mr. Denton:

In response to a request from the Emergency Planning Branch, Carolina Power & Light Company (CP&L) hereby submits three (3) copies of the Corporate Emergency Plan and Implementing Procedures. This document supplements information contained in the Shearon Harris Nuclear Power Plant (SHNPP) Emergency Plan.

As requested by Generic Letter No. 81-27 (July 9, 1981), CP&L draws your attention to the home telephone numbers listed in CEPIP-1, "Corporate Emergency Plan Notification" (pages 1-6 thru 1-21) and CEPIP-2, "Emergency Response Team Transportation" (page 2-4). CP&L requests that these home telephone numbers be withheld from public disclosure due to the private nature of this information. The specific telephone numbers to be withheld are identified in parenthesis on each affected page.

Yours very truly,

M. A. McDuffie
Senior Vice President
Nuclear Generation

GAS/lcv (9631NLU)
Attachment

cc: Mr. B. C. Buckley (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)
Mr. J. P. O'Reilly (NRC-RII)
Mr. G. E. Simonds (NRC)
Mr. Travis Payne (KUDZU)
Mr. Daniel F. Read (CHANGE/ELP)
Chapel Hill Public Library
Wake County Public Library
Mr. Wells Eddleman
Dr. Phyllis Lotchin
Mr. John D. Runkle
Dr. Richard D. Wilson
Mr. G. O. Bright (ASLB)
Dr. J. H. Carpenter (ASLB)
Mr. J. L. Kelley (ASLB)

X005
3/3

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 23, 1984

50-400 Shearon Harris

MEMORANDUM FOR: Chief, Document Management Branch, TIDC

FROM: Director, Division of Rules and Records, ADM

SUBJECT: REVIEW OF UTILITY EMERGENCY PLAN DOCUMENTATION

The Division of Rules and Records has reviewed the attached document and has determined that it may now be made publicly available.

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Attachment: As stated

CEP REV 2

Oct. 14, 1983

CORPORATE EMERGENCY PLAN

Table of Contents

CAROLINA POWER & LIGHT COMPANY
CORPORATE EMERGENCY PLAN

1.0 INTRODUCTION

Carolina Power & Light Company has developed this Corporate Emergency Plan (CEP) in accordance with the requirements of 10CFR50.47 and 10CFR50 Appendix E. This Plan is intended to provide Corporate emergency preparedness policies and direction for the Company's nuclear generating plants. Implementing procedures for this Plan supplement plant specific emergency plans as necessary to assure that adequate resources are available to handle any emergency at a Company nuclear generating plant. In the event of an emergency situation which requires the nuclear plant operations staff to seek assistance from off-site emergency preparedness agencies, CP&L will fully commit the Company's resources to assist in mitigating and recovering from the emergency condition and in protecting the public health and safety.

The Corporate Emergency Plan describes the advance planning made to enable CP&L corporate personnel to support the plant operating staff in responding to the spectrum of postulated accidents described in the plant-specific emergency plans.

The emergency response organizations established within CP&L and the overall control of CP&L's emergency response efforts have been developed by considering the Company's technical capabilities, the basic roles which the Company must initially assume during an emergency, and the manner in which these emergency response roles can most effectively be handled.

The emergency response resources available to respond to an emergency consist of the personnel at Company nuclear plants, at Corporate Headquarters, at other CP&L facilities, and, in the longer term, at organizations involved in the nuclear industry. The first line of defense in responding to an emergency lies with the normal operating shift on duty at the plant when the emergency begins. Therefore, members of each nuclear plant staff are assigned defined emergency response roles that are to be assumed whenever an emergency is declared. The overall management of an emergency is normally and initially performed by the Shift Supervisor or Shift Foreman. In the event of an emergency, he serves as the Site Emergency Coordinator until relieved by the Plant General Manager or his alternate. Because of the Plant General Manager's overall knowledge, he is best able to bring the full resources of the plant to bear on controlling the emergency. On-site personnel have preassigned roles to support the Site Emergency Coordinator and to implement his directives. These roles, for the purpose of emergency planning, are cast in terms of emergency teams and assignments, each having a designated leader or primary person and alternate(s) assigned to it.

Each team and individual assignment, as defined in individual plant emergency plans, carries with it specific emergency response duties, and each is provided with an on-shift person to perform those duties on an interim basis. This approach ensures under all conditions that every emergency response duty falls under some predesignated individual and provides a smooth transition as additional people are called to the plant, since each one knows ahead of time what his area of responsibilities will be.

The Site Emergency Coordinator will also have ready access to the Technical Support Group. This Group is comprised of personnel who are knowledgeable of and responsible for engineering and management support. The personnel assigned to the Group will assemble in the Technical Support Center shortly after an Alert, Site Emergency, or General Emergency is declared in order to assist the Site Emergency Coordinator and to carry out his directives.

Upon declaration of a Site or General Emergency, the Emergency Operations Facility will be activated and staffed by a group of corporate personnel under the direction of the Emergency Response Manager. Once the Emergency Operations Facility has been fully activated, the Emergency Response Manager will be responsible for all off-site emergency response including radiological and environmental assessment, determination of recommended public protective actions, and coordination of emergency response activities with federal, state, and local agencies. The Emergency Response Manager will manage the Corporate response activities to relieve the nuclear plant personnel of any activities that could hamper their response efforts, and to marshall the Corporate resources needed to properly respond to the emergency.

During a Site or General Emergency at any nuclear plant, the position of Corporate Emergency Operations Center Manager is established in the General Office to provide assistance to the Emergency Response Manager. At the Corporate level, CP&L has a large staff of well-trained and experienced engineeers, scientists, and technicians. The Nuclear Generation and Operations Support Groups of the Company alone include a total of over 5,000 personnel of which approximately 1,000 are college graduates. Over 550 of the graduates are directly involved in the engineering, licensing, construction, and operation of the Company's electric generating facilities. These personnel represent a pool of technical expertise which can be called upon to provide additional support to the corporate emergency response and recovery organizations, if required.

Another service performed by CP&L Headquarters is that of public information. The Corporate Communications Department will provide a staff at the nuclear plant and at Corporate Headquarters to interface with and provide accommodations for the press and the media in order to effectively communicate to the public the nature of an emergency in progress.

CP&L has arranged for support from outside CP&L at each nuclear plant in the areas of fire fighting, rescue and medical assistance, as well as that support delineated in the state and local emergency plans. Assistance may also be available from the Nuclear Regulatory Commission, Federal Emergency Management Agency, Department of Energy, Westinghouse, General Electric, United Engineers and Constructors, and Ebasco. The Industry resources identified by INPO are also available if needed. Special provisions have been made to assure that ample space and proper equipment are available to effectively respond to the full range of possible emergencies. The emergency facilities available to each nulcear plant include the Plant Control Room, Operational Support Center, Technical Support Center, Emergency Operations Facility, Plant Media Center, Harris Energy and Environmental Center, Corporate Headquarters Emergency Operations Center, and the Corporate Media Center. Each of these facilities are described in Chapter 7.0.

The Corporate Emergency Plan, as described in Chapter 12.0, provides for maintenance of emergency preparedness by establishing the framework and requirements for training, drills and exercises, and periodic updating. Each nuclear plant employee having an emergency response role is trained, and annually retrained, in his area of responsibility and also in how his duties fit in with those of others. Each individual must know what is expected of him and what he should expect of others while responding to an emergency. An outline of the required training for each emergency assignment is provided in CEPIP-19, "Emergency Plan Training Program." The effectiveness of such training is gauged by the use of drills and exercises. Drills are supervised instruction periods aimed at developing, maintaining, and testing skills in a specific operation such as communications or radiation monitoring. An exercise tests the overall capability of the integrated plant, state, and local emergency organizations to properly respond to an emergency. The individual plant plans set forth the frequency and content of such drills and exercises and also establish how lessons learned will be used to improve the emergency preparedness of each nuclear plant.

The Corporate Emergency Plan encompasses the following:

1. Classification requirements for emergency conditions.

2. Identification of the off-site organization which may be required to supplement the existing plant staff during an emergency.

3. Notification requirements for emergency condition.

4. Identification of off-site corporate and industry equipment, services, etc., which may be required.

5. Identification of emergency facilities and their uses.

6. Identification of the various communications capabilities required to provide information within the corporate emergency organization, as well as those associated with federal, state, and local agencies and the news media.

7. Identification of interfaces with state and local emergency plans.

8. Maintaining emergency preparedness by conducting periodic drills and exercises of simulated emergency conditions.

The Corporate Emergency Plan is supplemented by implementing procedures (CEPIPs) which describe the activation of the Plan and the responsibilities of those individuals whose support is necessary to minimize the effects of an emergency.

2.0 Definitions

2.1 Accident - Any unforeseen or unintentional occurrence or mishap resulting in, or potentially resulting in, physical injury or injury due to radiation exposure or excessive exposure to radioactive materials.

2.2 Activated - To formally put on active duty with the necessary personnel and equipment to carry out the function required.

2.3 Annual - At least once per 366 days.

2.4 Company - Carolina Power & Light Company.

2.5 Corporate Emergency Operations Center (CEOC) - The facility in the Corporate Office where resources for communications between the Corporate Office, the affected plant site, and other off-site support agencies are located.

2.6 Corporate Headquarters Media Center - The facility at the Corporate Office where, during a plant emergency, information pertaining to the affected plant site is disseminated to the news media simultaneously with distribution from the site.

2.7 Corrective Actions - Those emergency measures taken to lessen or terminate an emergency situation at or near the source of the problem, to prevent an uncontrolled release of radioactive material, or to reduce the magnitude of a release (e.g., equipment shutdown, fire fighting, repair, and damage control).

2.8 Dose - The quantity of radiation energy absorbed, per unit mass, by the body or any portion of the body.

2.9 Emergency - An unplanned circumstance which represents an immediate or likely hazard to life, health, property, or the environment.

2.10 Emergency Classification - The characterization of emergency situations consisting of several groupings including the entire spectrum of possible radiological emergencies. The four classes of emergencies, listed in order of increasing severity (and decreasing probability), are (1) Unusual Event, (2) Alert, (3) Site Emergency, and (4) General Emergency.

2.11 Emergency Instructions - Specific procedures that provide step-by-step instructions to guide plant operations during potential or actual emergency situations.

2.12 Emergency Planning Zones (EPZ) - A generic area defined about a nuclear plant to facilitate emergency planning off site. The plume exposure EPZ is described as an area with a 10 mile radius and the ingestion exposure EPZ is described as an area with a 50-mile radius in NUREG 0654.

2.13 Emergency Action Levels - Plant conditions used to determine the existence of an emergency and to classify its severity. The conditions include specific instrument readings (e.g., radiation release rates out of a building vent) that may be used as thresholds for initiating emergency measures, such as initiating a notification procedure.

2.14 Emergency Operations Centers (EOC) - Designated facilities designed and equipped for effective coordination and control of emergency operations carried out within an organization's jurisdiction.

2.15 Emergency Operations Facility (EOF) - A near-site support facility for the management of overall licensee emergency response, including coordination with federal, state, and local officials, coordination of off-site radiological and environmental assessment, and determination of recommended public protective actions.

2.16 Exclusion Area - Carolina Power & Light Company-owned property that surrounds the reactor plants as defined in 10CFR100. The area is of such size that an individual located at any point on its boundary for two hours immediately following onset of the postulated fission product release would not exceed 25 Rem whole body dose or 300 Rem thyroid dose.

2.17 Ingestion Exposure Pathway - The potential pathway of radioactive materials to the public through consumption of radiologically contaminated water and foods such as milk or fresh vegetables.

2.18 Monthly - At least once per 31 days.

2.19 Off-Site - All public and private property, without regard to distance, surrounding the plant exclusion area and contiguous Company property.

2.20 On-Site - The exclusion area and contiguous Company property.

2.21 Operational Support Center - The place on-site to which selected plant support personnel report and standby in an emergency situation.

2.22 Plant Media Center - The facility, operated by the Site Public Information Coordinator, which functions as a single-point contact location for disseminating information to the news media at the site.

2.23 Plume Exposure Pathway - The potential pathway of radioactive materials to the public through (a) whole body exposure from the plume and from deposited materials, and (b) inhalation of radioactive materials.

2.24 Population-at-Risk - Those persons for whom protective actions are being or would be taken.

2.25 Projected Dose - An estimate of the potential radiation dose which affected population groups could receive.

2.26 Protected Area - The double-fenced security area, posted with "No Trespassing" signs, with intrusion detection devices immediately surrounding the plant structures.

2.27 Protective Action - An action taken to avoid or reduce a projected dose (sometimes referred to as "protective measure").

2.28 Protective Action Guides - The projected or actual radiological dose to individuals in the population which warrants taking protective action.

2.29 Quarterly - At least once per 92 days.

2.30 Radiological Emergency - An off-normal situation that has or may have a radiological impact on the public health and safety.

2.31 Recovery Actions - Those actions taken after an emergency to restore the plant and the surrounding environment as nearly as possible to its pre-emergency condition.

2.32 Restricted Area - Any area, access to which is controlled by Carolina Power & Light Company for purposes of protection of individuals from exposure of radiation and radioactive materials.

2.33 Review - A systematic evaluation documented by a signature, initial, stamp, or written report.

2.34 Semiannually - At least once per 184 days.

2.35 State Emergency Operations Center - The facility located in the state capital from which state government officials exercise direction and support of off-site activities during an emergency.

2.36 Technical Support Center - A center outside of the Control Room in which information is supplied on the status of the plant to those individuals who are knowledgeable or responsible for engineering and management support of reactor operations in the event of an emergency, and to those persons who are responsible for management of the on-site emergency response.

2.37 Unrestricted Area - Any area to which access is not controlled by the licensee for protecting individuals from exposure to radiation and radioactive materials, and any area used for residential quarters.

3.0 Classification of Emergencies

The Site Emergency Coordinator at each plant determines that an emergency exists and assigns the proper classification as specified in the emergency plan for each nuclear plant. Emergencies are classified in one of four categories. Detailed descriptions of these classifications are given in the plant specific emergency plans.

3.1 Unusual Event - Events are in process or have occurred which indicates a potential degradation of the level of safety of the plant.

3.2 Alert - Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant.

3.3 Site Emergency - Events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public.

3.4 General Emergency - Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity.

4.0 Organization and Responsibilities

There are requirements for action in an emergency that go beyond those encountered during routine operations. To meet these extra demands and provide an effective response to the emergency, the Corporate Emergency Plan employs an organizational concept that has four features:

1. Whenever the Plan is activated (i.e., an EAL is exceeded), a single individual is charged with the responsibility for and authority to direct all actions necessary to respond to the emergency.

2. The primary responsibility of the individual in charge is to assure that all critical actions (emergency response functions) are carried out. Upon activation of the Plan, he is freed of all other responsibilities and thus able to devote his entire effort to managing the emergency response.

3. Specific individuals are assigned the responsibility of carrying out predefined critical actions.

4. There is a mechanism established to provide additional resources as necessary to respond to the emergency.

This concept of organization is compatible with and integrated into the normal mode of operation. The plant operating staff is routinely required to correct malfunctions of equipment and to diagnose the consequences of possible radioactivity releases. There are a number of procedures to guide the plant staff in responding to equipment malfunctions. There are also procedures to maintain effective control over contamination and radiation exposures. Emergency procedures basically involve an extension of these existing plant procedures.

Organizational control of emergencies is accomplished in several steps. First, conditions associated with the various emergency classes are clearly defined in the plant specific emergency plans. Second, emergency response functions are specified with levels of action appropriate to each emergency class (e.g., notification, off-site radiation monitoring, etc.). Third, individuals are assigned to be responsible for carrying out each emergency response function, with the assignments to cover all aspects of the emergency. The position of Site Emergency Coordinator and his staff is established and is activated in accordance with an individual plant emergency plan. Finally, the Corporate Emergency Plan is activated and required resources are made available to the affected plant as needed.

The authority to act on behalf of the Company to manage and direct all emergency operations involving the facility is initially delegated to the Site Emergency Coordinator. The Site Emergency Coordinator directs all activities to mitigate the consequences of an emergency until relieved by the Emergency

Response Manager. Upon activation of the Emergency Operating Facilty (EOF), the Emergency Response Manager assumes responsibility of overall emergency response and manages those requirements for all off-site related activities. The Site Emergency Coordinator maintains overall on-site emergency response responsibilities and reports to the Emergency Response Manager.

The Corporate emergency response organization consists of the Emergency Response Manager, his staff, and any augmented personnel required to expand and/or support the plant emergency response organization as shown in Figure 4.0-1. The responsibilities of plant personnel who respond to an emergency are contained in individual plant emergency plans. The responsibilities of non-plant members of the Corporate Emergency Response Organization are provided below:

4.1 Emergency Response Manager

Emergency Response Manager:

Vice President - Brunswick Nuclear Project (Brunswick)
Vice President - Harris Nuclear Project (Harris)
Manager - Robinson Nuclear Project (Robinson)

Alternate:

Vice President - Operations Training and Technical Services
Manager - Corporate Quality Assurance

The Emergency Response Manager is responsible for managing and directing all emergency operations involving the facility. He relieves the Site Emergency Coordinator of the requirements for all off-site related activities. He provides liaison between the Site Emergency Coordinator and off-site support personnel (Corporate Headquarters, Corporate Spokesman, Media Team Leaders, state and federal agencies), and marshalls off-site support as required to support the Site Emergency Coordinator. The responsibilities and objectives of this position and a description of his staff are contained in CEPIP-3, "Emergency Response Manager."

4.2 Technical Analysis Manager

Technical Analysis Manager:

Director - Safety Review Nuclear Engineering

Alternate:

Director - On-Site Nuclear Safety (Brunswick)
Director - On-Site Nuclear Safety (Harris)
Director - On-Site Nuclear Safety (Robinson)

The Technical Analysis Manager is responsible to the Emergency Response Manager for coordinating technical information coming from the Technical Support Center, supplying the Emergency Response Manager with an assessment of the emergency, and providing interface for the Emergency Response Manager to consultants, regulatory agencies, architect-engineers, and nuclear steam system suppliers. The responsibilities and objectives of this position and a description of his staff are contained in CEPIP-4, "Technical Analysis Manager."

4.3 Administrative and Logistics Manager

Administrative and Logistics Manager:

Manager - Construction Procurement Services

Alternate:

Manager - Purchasing

The Administrative and Logistics Manager is responsible to the Emergency Response Manager for providing assistance to the Emergency Response Manager in administrative, logistics, communications, and personnel support, and assisting the on-site Logistics Support Director as requested. The responsibilities and objectives of this position and a description of his staff are contained in CEPIP-5, "Administrative and Logistics Manager."

4.4 Radiological Control Manager

Radiological Control Manager:

Manager - Radiological & Chemical Support

Alternate:

Director - Health Physics, Harris Energy and Environmental Center

The Radiological Control Manager is responsible to the Emergency Response Manager for coordinating off-site radiological and environmental assessment and recommending

to the Emergency Response Manager protective actions necessary to protect the public health and safety. The responsibilities and objectives of this position and a description of his staff are contained in CEPIP-6, "Radiological Control Manager."

4.5 Corporate Emergency Operations Center Manager

Corporate Emergency Operations Center Manager:

Senior Vice President - Fossil Generation and Power Transmission

Alternate:

Senior Vice President - Operations Support

The primary responsibilities of the Corporate Emergency Operations Center Manager are to assure that the full resources of the Corporation are quickly made available as may be required to safely secure the plant systems and to minimize the effects of the incident on plant personnel and the public. The responsibilities and objectives of this position and a description of his staff are contained in CEPIP-7, "Corporate Emergency Operations Center Manager."

4.6 Corporate Emergency Operating Center Staff. The Corporate Emergency Operations Center organization provides continuing communications between Corporate Management and the affected plant. The Corporate Emergency Operations Center is set up, staffed, and operated in accordance with CEPIP-8, "Corporate Emergency Operations Center Activation and Operation."

4.6.1 CEOC Operations Coordinator

Operation Coordinator:

Assistant to the Group Executive - Fossil Generation and Power Transmission

Alternate:

Principal Specialist - Nuclear Administration

The CEOC Operations Coordinator plans for and provides necessary personnel, documentation, and equipment to coordinate the flow of technical information through the Corporate Operations Center, maintains a current status of plant conditions for corporate management, and oversees all operations of the Corporate Emergency Operations Center to fully support the CEOC Manager. The responsibilities and objectives of this position are contained in CEPIP-9, "CEOC Operations Coordinator."

4.6.2 System Communications Coordinator

System Communications Coordinator:

Manager - Transmission and Substation Maintenance

Alternate:

Manager - Relay & Electronics Engineering and Construction

The System Communications Coordinator plans for and provides necessary equipment to facilitate communications between the corporate offices, the affected plant, other company facilities, and outside agencies. The responsibilities and objectives of this position are contained in CEPIP-10, "System Communications Coordinator."

4.7 Headquarters Public Information Coordinator

Headquarters Public Information Coordinator:

Vice President - Corporate Communications

Alternate:

Manager - Communications Services

The Headquarters Public Information Coordinator directs the activities of the Corporate Headquarters Media Center, maintains liaison with the Plant Media Center and coordinates news media services at the Corporate Headquarters. The responsibilities and objectives of this position are contained in CEPIP-11, "Headquarters Public Information Coordinator."

4.8 Corporate Spokesman

Corporate Spokesman:

Vice President - Corporate Nuclear Safety & Research

Alternate:

Vice President - Nuclear Plant Engineering

The Corporate Spokesman makes all public statements for the Company to the media at the site concerning the effect of the emergency on the Company, the specific details of the emergency, and steps the Company is taking to mitigate it. The responsibilities and objectives of this position are contained in CEPIP-12, "Corporate Spokesman."

4.9 Site Public Information Coordinator

Site Public Information Coordinator:

Manager - News Services

Alternate:

News Coordinator - News Services

The Site Public Information Coordinator is responsible for providing liaison between the Emergency Response Manager, Corporate Spokesman, the Plant Media Center, and the Corporate Media Center. He also serves as director of the Plant Media Center during a declared emergency. His responsibilities and objectives are contained in CEPIP-13, "Site Public Information Coordinator."

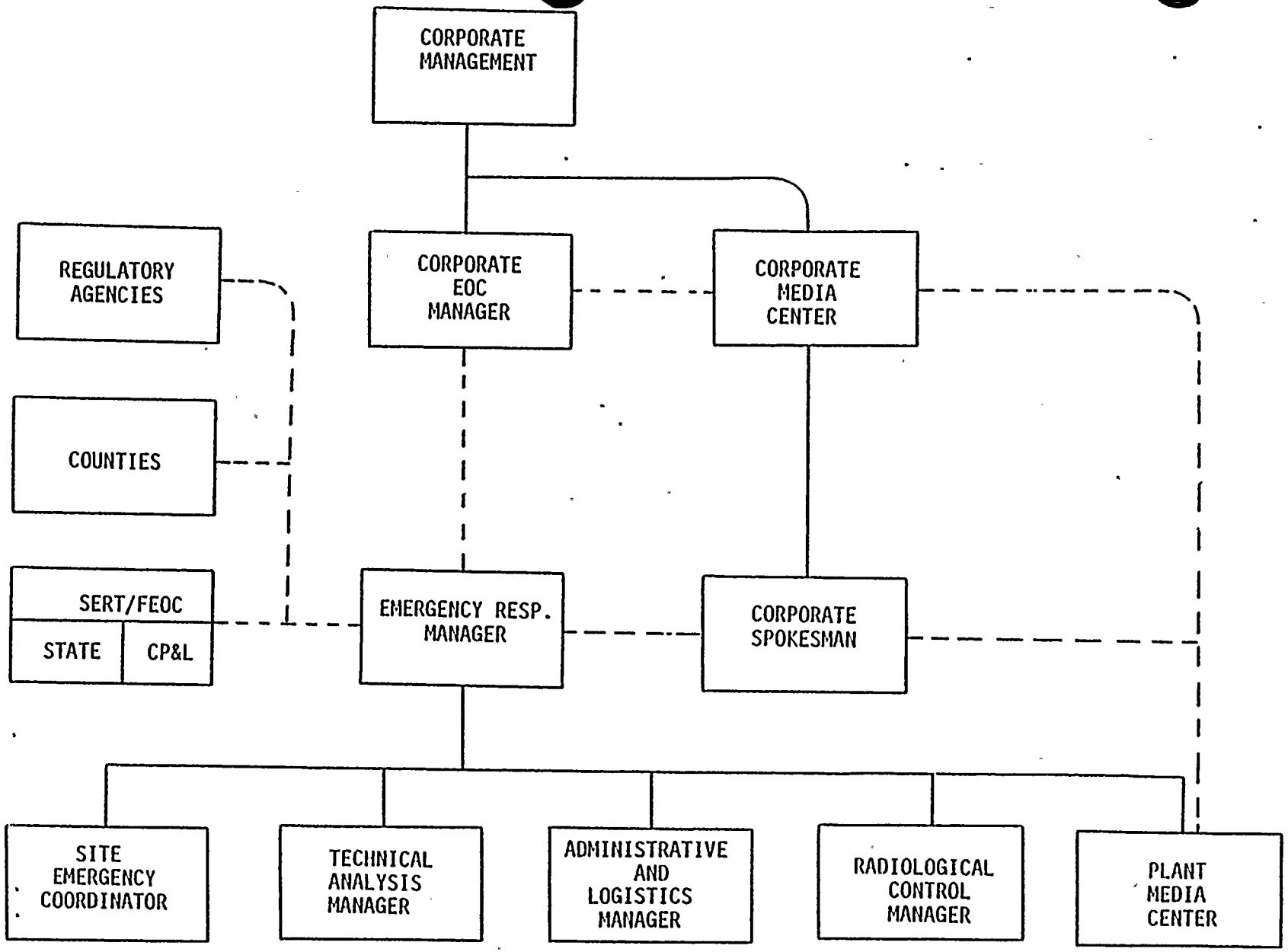

Figure 4.0-1 CP&L Emergency Response Organization

Operation
Information

5.0 Notification of Emergencies

5.1 Corporate Organization

Notification and activation of the off-site corporate emergency response organization will be determined, based on the emergency classification and discussions with the Manager of the affected plant, by the Nuclear Project Department Manager (or alternate). Details of notification responsibilities are described in CEPIP-1, "Corporate Emergency Plan Notification." The support managers identified in Figure 4.0-1 are each responsible for developing a notification procedure for their staff to ensure that adequate personnel are available to support their respective function.

5.2 Outside Agencies

Notification of outside agencies will proceed as specified in CEPIP-1, "Corporate Emergency Plan Notification," and in the plant specific emergency plans and implementing procedures.

6.0 Emergency Measures

6.1 The affected Nuclear Project Department Manager (or alternate), with the advice of the Plant General Manager at the affected plant, will determine the degree to which the off-site Corporate emergency response organization should be mobilized and will activate the Corporate Emergency Plan as appropriate.

The mobilized members of the Corporate Emergency Response Organization will proceed to their designated locations, in accordance with CEPIP-2 "Emergency Response Team Transportation," as expeditiously as practicable and provide the required support to the affected plant organization.

6.2 Each plant specific emergency plan includes a description of the methodologies and techniques required to:

6.2.1 Determine the magnitude of the release of radioactive materials.

6.2.2 Determine the magnitude and distribution of any resulting radioactive contamination.

6.2.3 Estimate the projected exposure of persons on site and off site.

6.2.4 Determine whether specified Emergency Action Levels and Protective Action Guides have been reached.

6.2.5 Provide for public warning and notification.

6.2.6 Inform and educate the public on what to do in an emergency.

6.3 Each plant's specific emergency plan describes the measures that will be used by the Company to provide necessary assistance to persons injured or exposed to radiation and radioactive material. These measures include:

6.3.1 Emergency personnel exposure.

6.3.2 Decontamination and first aid.

6.3.3 Medical transportation.

6.3.4 Medical treatment.

6.4 The Corporate Secretary, working through the Administrative and Logistics Manager, will provide appropriate Company and Contractor insurance personnel to process claims for financial losses resulting from off-site emergency activities.

7.0 Emergency Facilities and Equipment

7.1 Plant Control Room

The plant Control Room provides a location for operations personnel who are directly responsible for plant control and emergency responses. All plant-related operations are directed from the Control Room. Until relieved by the Technical Support Center staff, the Control Room serves as the primary location to direct emergency actions.

7.2 Technical Support Center (TSC)

The Technical Support Center provides a location for the Site Emergency Coordinator (Plant General Manager or his alternate) and key management personnel to assess on-site plant conditions and direct emergency response activities of the plant staff. The location of the Technical Support Center and equipment located in the Technical Support Center are detailed in the plant specific emergency plans. Until relieved by the Emergency Operations Facility staff of responsibility for off-site related activities, the Technical Support Center will serve as the primary location to direct all emergency actions. This facility will be activated for the Alert, Site Emergency, or General Emergency conditions. Activation is discretionary for lesser emergencies.

7.3 Emergency Operations Facility (EOF)

The Emergency Operations Facility is activated by and under the direction of the Emergency Response Manager when he is notified by the Site Emergency Coordinator that a Site Emergency or a General Emergency condition exists at a nuclear plant. Activation is discretionary for lesser emergencies. The Emergency Operations Facility will serve as the primary location to direct overall emergency actions, particularly those related to off-site activities.

7.4 Operational Support Center

The Operational Support Center provides an on-site location where plant maintenance, operations, health physics technicians, environmental and chemistry technicians, and other plant emergency support personnel will assemble and stand by to assist as needed.

7.5 Plant Media Center

The Plant Media Center, located in or near the existing plant Visitors Center, will have work space and telephones for use by company, supporting staff, and media personnel. Briefings for the news media will be held at this location.

7.6 Corporate Headquarters Media Center

The Corporate Headquarters Media Center, located at the Civic Center adjacent to the Corporate Headquarters, will provide a location to make information available directly to the news media who go to the Corporate Office.

7.7 Corporate Emergency Operations Center

The function of the Corporate Emergency Operations Center (CEOC) is to provide a location for the corporate command group at the Corporate Headquarters in Raleigh, North Carolina. The Corporate command group will provide support to the Emergency Response Manager.

8.0 Corporate Communications Activities

When the Headquarters Public Information Coordinator (Vice President - Corporate Communications or alternate) is notified that an emergency situation exists, he will have the responsibility to: (1) Dispatch a staff to the site of the emergency supplied with appropriate booklets, brochures, and information about the plant, (2) coordinate the flow of information within the Corporate Offices by establishing the Corporate Headquarters Media Center, (3) assure that news media information is provided in a timely way by providing sufficient personnel to the Plant Media Center and the Corporate Headquarters Media Center, and (4) ensure coordination with federal, state, and local media representatives at the Emergency Operations Centers in the plant vicinity and at state headquarters, if they are activated.

8.1 Media Kits

The Headquarters Public Information Coordinator will be responsible for providing prepackaged media kits which will be stored at the site for use in the event of an emergency. The media kit contains diagrams of the plant, photographs of the plant, photographs and biographies of key plant personnel and corporate officials, a brief description of the facilities, including architect engineer, constructor, nuclear steam system supplier, rated capacity, date of installation, and similar information about the plant. Media kits will also be made available in the Corporate Headquarters Media Center and the Corporate Emergency Operations Center.

8.2 Communications Facilities for News Media

The Headquarters Public Information Coordinator will be responsible for determining the need for providing public telephone facilities for the news media at the Corporate Headquarters Media Center during the course of an emergency and will notify the System Communications Coordinator of these requirements. The System Communications Coordinator will then make all arrangements for the installation or removal of telephone facilities as needed.

The Site Public Information Coordinator will be responsible to ensure adequate telephone facilities for the news media are available at the Plant Media Center.

The emergency communication system shall be established such that news media and Corporate management personnel located in Raleigh can participate in media briefings held at the Plant Media Center.

8.3 Rumor Control

The Headquarters Public Information Coordinator will provide a toll-free number which can be called by the public to clarify emergency conditions. A staff of communication personnel will be available to respond to incoming public calls.

8.4 Employee Information

The Headquarters Public Information Coordinator will be responsible for keeping employees informed about the emergency during its duration and will do so by publishing info-bulletins, info-briefs, or other employee information.

8.5 Industry Communication

The Headquarters Public Information Coordinator will be responsible for relaying status reports to neighboring utilities, the Atomic Industrial Forum, the Edison Electric Institute, the American Nuclear Society, and others as appropriate.

9.0 Coordination with Federal, State, and Local Agencies

During an emergency, various federal, state, and local agencies complement the Corporate structure in protecting the public and bringing the emergency to an end. Therefore, communication channels are made available for coordination with these various agencies to gain control over the emergency.

9.1 Nuclear Regulatory Commission

9.1.1 Notification of the NRC will proceed as specified in the plant specific plans.

9.1.2 The resident NRC inspector(s), other NRC inspectors, and plant personnel may have direct communications from the plant to the NRC headquarters.

9.1.3 Coordination of NRC activities will be accomplished through the resident inspector assigned to the affected unit or through the NRC designated senior inspector on site if the resident inspector is not in place.

9.1.4 When activated, the Emergency Response Manager is responsible for coordinating NRC activities at the site in an effort to reduce duplication of effort and reduce impact on the plant staff during the emergency situation.

9.1.5 Provisions have been made to have the direct NRC line ring in the Technical Support Center and Emergency Operations Facility during an emergency situation. This arrangement will allow personnel in the Control Room to continue responding to the emergency while those in the Technical Support Center and Emergency Operations Facility respond to questions from the NRC.

9.1.6 Nuclear Regulatory Commission activities requiring response from the Corporate Office will be coordinated through the Licensing Section.

9.1.7 Reports and written requests to the NRC will follow the existing procedure for NRC correspondence.

9.2 Federal Emergency Management Agency (FEMA)

Coordination of response from the FEMA will be through the Emergency Operations Facility organization. Coordination of on-site activities with FEMA beyond the information provided to the EOF personnel is not necessary.

9.3 State Government

9.3.1 The North Carolina Emergency Operations Center (EOC) is located in Raleigh, North Carolina. When necessary, it will be activated and staffed to assist in coordinating emergency operations in support of the Brunswick Steam Electric Plant and the Shearon Harris Nuclear Power Plant. The N.C. Department of Crime Control and Public Safety will also activate a field command post near the plant to provide local direction of emergency activities. The field command post will be operated by the State Emergency Response Team (SERT). CP&L will provide liaison personnel to both the State EOC and the SERT Headquarters.

9.3.2 The South Carolina Emergency Operations Center (EOC) is located in Columbia, South Carolina. When necessary, it will be activated and staffed to assist in coordinating emergency operations in support of the H. B. Robinson Steam Electric Plant. The South Carolina Emergency Preparedness Division of the Office of the Adjutant General will activate a field command post, the Forward Emergency Operations Center (FEOC), located in the South Carolina National Guard Armory in Darlington, about eighteen miles from the Robinson site. This Center is staffed primarily by state and federal personnel with CP&L providing liaison personnel. The FEOC provides the focal point for all state and federal off-site activities and the contact point for coordinating with on-site activities. CP&L will provide liaison personnel to both the State EOC and FEOC.

9.3.3 The site media team located in the Plant Media Center will coordinate information to be released with the federal, state, and local agencies' media representatives in the local area.

9.3.4 The Company President, or his designee, will interface directly with the State Governor, keeping him informed of conditions at the plant and coordinating management actions with the Governor.

9.3.5 If the State Emergency Operations Center (SEOC) is activated, the Headquarters Public Information Coordinator will dispatch a representative to that SEOC to assist state public information offices in their efforts to keep abreast of activities around the site.

9.3.6 If the State Emergency Operations Center is activated, the Corporate Emergency Operations

Center Manager will dispatch a technical representative to the State Emergency Operations Center to assist in the proper interpretation of technical information from the field.

9.4 Local Government

Coordination with local government agencies will be through emergency operations centers established by local or county governments near the affected plant.

10.0 Communications Systems

Reliable communications systems will be available to assure communications between Corporate Management and corporate emergency organization onsite. Communications systems are identified in the site-specific plans.

11.0 Off-Site Support Capabilities

11.1 Nuclear Project Support Personnel

The Nuclear Project Department Managers are responsible for construction, operation, and maintenance of the Brunswick, Robinson, and Harris Nuclear Power Plants. The Plant General Managers of these nuclear plants report to the Nuclear Project Department Manager located on site. An emergency at one nuclear plant should have no impact on other Company plants. Other plants represent a resource of trained personnel to assist in health physics, maintenance and repairs, engineering, and operations.

11.1.1 The Company's nuclear plant staffs provide a resource of managers, supervisors, and foremen. This management resource is available to respond to an emergency at a nuclear plant.

11.1.2 The nuclear plants have a substantial number of specialists and engineers, maintenance personnel, operators, technicians, and numerous other specialists available to respond. All personnel assigned to the affected unit would be available to respond to an emergency. Some may also be temporarily transferred from unaffected units to assist.

11.2 Operations Training and Technical Services Department

The Department Head - Operations Training and Technical Services Department provides direct technical assistance to the Nuclear Plant Projects during normal and emergency conditions.

11.2.1 The Radiological and Chemical Support Section located in the Harris Energy & Environmental Center (HE&EC) provides support during an emergency in the areas of health physics, chemistry, radioactive waste management, dosimetry, and environmental monitoring.

11.2.1.1 Dosimetry service for all Company nuclear facilities is provided from the HE&EC. TLD readers are available and can be transported to the affected plant to provide dosimetry services locally.

11.2.1.2 A whole body counter is mounted in a van and can be transported to the affected plant for monitoring selected personnel for internal contamination with radionuclides.

11.2.1.3 A specially equipped laboratory for low level environmental radiological analysis is located in the HE&EC. This laboratory would provide analysis of environmental samples collected in the vicinity of the affected facility.

11.2.1.4 Equipment in the environmental laboratory in the HE&EC includes special sample preparation, low background proportional beta counters, liquid scintillation, and a computer-based gamma analysis system.

11.2.1.5 A radiochemical laboratory, located adjacent to the environmental laboratory in the HE&EC, is also equipped with analytical equipment including a computer-based gamma analysis system for analysis of samples from a plant.

11.2.1.6 The radiochemical laboratory can be utilized to assist in the analysis of environmental samples sent to the HE&EC or equipment from the laboratory can be transported to the affected plant and set up to provide on-site analyses as needed.

11.2.1.7 A self-contained mobile laboratory, which has two generators for power can be transported to the affected site. It has the capabilities to perform gamma isotopic analysis, air particulates, gas, liquids, vegetation, and soil samples. It also has an automatic low beta counter capable of analyzing gross alpha, beta and gamma radiation. The lab is equipped with kits to supply three field survey teams at any time. The instrumentation of the mobile lab has the capability of replacing any of the nuclear plant labs.

11.2.2 The Nuclear Training Section provides training in the areas of operations, maintenance, health physics, and chemistry.

11.2.2.1 A PWR reactor simulator is operational at the HE&EC and could be utilized for special training or other assignments during an emergency. A BWR simulator at Brunswick could be used in a similar manner.

11.2.2.2 An I&C laboratory at the HE&EC could be utilized for any special training required prior to working I&C tasks.

11.2.2.3 A welding laboratory, mechanical laboratory, and a heavy electrical laboratory are scheduled so that special training needed in these areas can be done.

11.2.3 The Emergency Preparedness Unit has overall Corporate responsibility in developing and maintaining an emergency preparedness program. The Director - Emergency Preparedness is responsible to ensure the Corporate Emergency Program is in compliance with regulatory requirements and company policies.

11.3 Fossil Generation Department

11.3.1 CP&L non-nuclear generating plants under the Vice President - Fossil Generation have substantial numbers of managers, superintendents, supervisors, engineers and specialists, foremen, maintenance personnel, and operators. Though unaffected facilities would continue operating, some of these personnel could be reassigned to assist during an emergency situation. Other personnel at these plants, including engineering technicians, clerk-typists, and stores personnel could also be made available.

11.3.2 The Operations and Maintenance Section, under the Vice President - Fossil Generation provide support to fossil as well as nuclear plants and employs specialists in various types of equipment operation and maintenance. These personnel would be available for assignment to the recovery organization to assist in the recovery effort.

11.4 Nuclear Plant Engineering Department

The Nuclear Plant Engineering Department is responsible for the management of engineering on new nuclear projects and on operating nuclear plant modifications. This Department will provide support to the recovery organization:

11.4.1 Planning, scheduling, estimating, cost control, and overall coordination of engineering activities.

11.4.2 Engineering assistance to operating plants related to electric power systems, instrumentation and control, and mechanical/nuclear systems.

11.4.3 Assuring that design and engineering provided by the Company's A/E and engineering consultants is acceptable, meets budget and schedule objectives, and complies with necessary codes and safety regulations.

11.5 Nuclear Plant Construction Department

The Nuclear Plant Construction Department is responsible for management of construction on new nuclear plants, operating plant modifications, and miscellaneous construction activities. The Nuclear Plant Construction Department provides support to the recovery effort:

11.5.1 Providing construction contracts, construction planning and scheduling, site development engineering, reviews of design drawings, and assuring adequate manning of construction projects.

11.5.2 Providing site procurement, expediting, and when necessary, providing site equipment, material and tool management, and providing support for site warehousing and inventory control.

11.6 Corporate Purchasing Section

11.6.1 The Corporate Purchasing Section will provide manpower to assist the Administrative and Logistics Manager in locating, ordering, and receiving equipment and materials needed to carry out the emergency response plan.

11.6.2 The Corporate Purchasing Section will also assist the Administrative and Logistics Manager in maintaining inventory lists and expediting the delivery of equipment to support the emergency response operation.

11.7 Corporate Nuclear Safety & Research Department

11.7.1 Through the Vice President - Corporate Nuclear Safety & Research, the Corporate Nuclear Safety & Research Department is responsible for assuring that all nuclear safety matters pertaining to the engineering, construction, and operation of the Company's nuclear facilities receive appropriate attention.

11.7.2 The Vice President - Corporate Nuclear Safety & Research reports directly to the Executive Vice President - Power Supply and Engineering & Construction. He is the Corporate Spokesman in the event of an emergency requiring activation of the corporate emergency organization.

11.7.3 Additional personnel with expertise in nuclear safety, health physics, and research and development are available to participate as part of the corporate emergency organization as required by corporate emergency organization management.

11.8 Architect Engineer

The Architect Engineer will support the Site Emergency Coordinator, the Emergency Response Manager, and the Corporate Emergency Operations Center Manager.

11.8.1 Services of the Architect Engineer responsible for design and engineering of the affected nuclear plant will be available to the Company in case of plant emergencies. These Architect Engineers are Ebasco Services (H. B. Robinson Unit 2 and Shearon Harris Units 1 and 2), and United Engineers and Constructors (Brunswick Units 1 and 2).

11.8.2 Ebasco Services, Inc. (Ebasco) performed architect- engineer services for H. B. Robinson Unit 2 and is engaged for engineering of the Shearon Harris Units 1 and 2. Ebasco's technical staff is engaged in all phases of public utility engineering, design, construction, purchasing, inspection, and expedition of material, as well as consultation on utility operating matters. Ebasco has available, and is able to bring to bear on any given project, a broad range of engineering, construction and consulting experience. Ebasco's nuclear experience includes engineering studies, the evaluation of reactor systems, selection of nuclear sites, safety evaluations, detailed engineering design, construction, and start-up and testing of nuclear power facilities.

11.8.3 United Engineers and Constructors, Inc. (UE&C) performed architect-engineer services for Brunswick Units 1 and 2. United Engineers and Constructors has been actively engaged in nuclear work since 1948. United Engineers and Constructors capabilities are similar to those listed above for Ebasco Services.

11.9 Nuclear Steam Supply System Vendor (NSSS)

The Nuclear Steam Supply System (NSSS) vendor supports the Site Emergency Coordinator, the Emergency Response Manager, and the Corporate Emergency Operations Center Manager.

11.9.1 Services of the NSSS vendor for Company nuclear plants will be available to the Company in case of plant emergencies. The NSSS for Robinson Unit 2 and Shearon Harris Units 1 and 2 were provided by Westinghouse Electric Corporation (Westinghouse). The NSSS for Brunswick Units 1 and 2 were provided by the General Electric Company.

11.9.2 Westinghouse has been a major element in the electrical manufacturing industry. Through early participation in basic research and basic engineering development, Westinghouse has established a broad technological foundation in nuclear power application. This participation has been followed by a continuing program of technological development which has enabled Westinghouse to offer to the electric utility industry a reliable and safe source of nuclear power.

11.9.3 The General Electric Company (General Electric) has been engaged in the development, design, construction, and operation of boiling water reactors since 1955. General Electric's total nuclear capability includes the experience gained from the design and construction of test and research reactors and the management and conduct of numerous nuclear research and development programs for the utility industry, the Department of Energy, and overseas customers.

11.10 Nuclear Industry

11.10.1 The nuclear industry provides a large reservoir of personnel with a wide range of technical expertise and knowledge to assist the Corporate Emergency Response Organization if required in an emergency. A nuclear industry national inventory of personnel who might be called upon to supplement Company personnel will be available from the Institute of Nuclear Power Operations (INPO) for use by the Emergency Response Manager and his site management team.

11.10.2 In addition, a national inventory of equipment, materials, etc., which might be needed in an emergency will be available from INPO. The inventory contains a listing of equipment, location of the equipment, and the name of a person to contact regarding availability.

11.10.3 The national inventory lists are updated periodically by INPO.

11.11 Neighboring Utilities

Support which might be called for from neighboring utilities would include the following:

11.11.1 Manpower and equipment to assist in on-site and off-site radiological monitoring.

11.11.2 Verification of off-site dose projections.

11.11.3 Engineering, design, and technical expertise to assist in determining the cause of the accident and to support the Emergency Response Manager.

11.11.4 Manpower and equipment to assist in maintenance and repairs to the facility.

11.12 Educational Institutions

Educational institutions support capabilities which might be called upon include the following:

11.12.1 Manpower in specialized disciplines which could provide support to the Emergency Response Manager.

11.12.2 Laboratories which could be useful in analyzing various environmental samples.

11.12.3 Computer capabilities useful in verifying off-site dose projections.

11.13 Corporate Systems Communications Personnel

Technical expertise in the field of communication system design, operation, and maintenance is available within the Corporate organization. Personnel in several departments are available to assist in developing the details of the communication systems required to implement the Corporate Emergency Plan and maintain operability of the system during the emergency.

12.0 Maintaining Emergency Preparedness

12.1 Organizational Preparedness

12.1.1 Training

Personnel in the corporate off-site and plant emergency organizations who may be required to perform functions specified in the Corporate Emergency Plan will receive initial training and periodic retraining. The training consists of familiarization of the emergency response personnel with the emergency plan and the implementing procedures required to carry out their specific functions. Annual review of the plans and appropriate implementing procedures is required. The training program ensures that personnel who may be called upon to fill a major role in the emergency organization will be familiar with the plan and procedures to be able to respond promptly and proceed to their designated work area without any undue delay. See CEPIP-19, "Emergency Plan Training Program," for details of the Corporate training requirements.

12.1.2 Exercises

Exercises are conducted on at least an annual basis (not to exceed 15 months between successive exercises) to test the adequacy of timing and control of implementing procedures and methods, to test emergency equipment, and to ensure that corporate emergency organization personnel are familiar with their duties. Preplanned descriptions and simulations of emergencies are used to prepare scenarios appropriate to the objectives of each exercise. Each exercise tests, as a minimum, major portions of the emergency response plans, the communications links, and notification procedures to assure capability to promptly notify the necessary members of the Corporate Emergency Plan. Provisions are made for critique of all drills and exercises. See CEPIP 18, "Emergency Response Exercises and Drills," for details of emergency response exercises.

12.1.3 Drills

A drill is a supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation. Specific drills intended to maintain emergency preparedness are contained in Plant Emergency Plans and implementing procedures.

12.2 Review and Update of Plan and Procedures

An annual review of the Corporate Emergency Plan is performed by the Director - Emergency Preparedness. The annual review is utilized to update the plan and to improve emergency procedures required by the plan.

All revisions to the Corporate Emergency Plan (CEP) and the Corporate Emergency Plan Implementing Procedures (CEPIPs) are evaluated by each Plant General Manager or his designee and the Director Emergency Preparedness to determine whether the individual Plant Emergency Plans and implementing procedures are consistant with any program change implemented by the revision. Where differences exist, Plant Emergency Plans and implementing procedures are revised to ensure conformance with corporate policy.

The Director - Emergency Preparedness is responsible for maintaining the Corporate Emergency Plan and procedures and for the distribution of copies of the plan and any revisions thereto.

12.3 Maintenance and Inventory of Emergency Equipment and Supplies

Procedures and instructions established to implement the Corporate Emergency Plan include provisions for assuring operational readiness of emergency equipment and supplies specified in the plan. The procedures and instructions include provisions for performing maintenance, surveillance testing, and inventory on emergency equipment and supplies.

CP&L

Carolina Power & Light Company

CORPORATE EMERGENCY PLAN

POLICY STATEMENT

It is the policy of Carolina Power & Light Company to engineer, construct, and operate nuclear power plants without jeopardy to public health and safety. Measures shall be developed at each operating nuclear plant to protect plant employees, contractors, and the general public in the event of an emergency at the plant. The measures shall be documented in emergency plans and procedures developed for each nuclear plant under the direct responsibility of the Plant General Manager. A Corporate Emergency Plan shall be developed and maintained which provides Corporate emergency preparedness policies and direction for the Company's nuclear generating plants. Implementing procedures for this Plan shall supplement plant specific emergency plans as necessary to assure adequate resources are available to handle any emergency at a Company nuclear plant. The Plan shall specify in detail additional off-site resources which may be required to supplement the existing plant staff in an emergency. The resources identified in the Corporate Emergency Plan shall be necessary off-site assistance to support plant operations, public information activities, and emergency communication activities.

This Plan shall be maintained in full compliance with all regulatory requirements.

The organizational structure and responsibilities for each level of CP&L management to implement this Corporate Emergency Plan shall be outlined in detail in the Plan and implementing procedures.

The effective date for implementation of change to this Corporate Emergency Plan shall not be later than fifteen (15) days after the revision date identified in the Revision and Approval Status. The control, revision, and distribution of this Corporate Emergency Plan is outlined in detail in Section 12.2, "Review and Update of Plan and Procedures," of the Plan.

Issued By: _____ Date: 11-5-82

E. E. Utley
Executive Vice President
Power Supply and Engineering & Construction

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602