DUKE POWER COMPANY

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July 1, 1981

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Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20553

> Atcention: Ms. E. G. Adensam, Acting Chief Licensing Branch No. 4

Subject: McGuire Nuclear Station

Docket Nos. 50-369 and 50-370

Table B-1 of NUREG-0654 provides detailed NRC guidance on the minumum staffing requirements for emergency situations at nuclear power plants. My letter of

Dear Mr. Denton:

requirements for emergency situations at nuclear power plants. My letter of April 3, 1981 described Duke's proposed staffing for emergency situations at McGuire Nuclear Station. Condition (11)m. of Facility Operating License No. NPF-9, issued June 12, 1981, requires that Duke submit by July 1, 1981 a description of how the augmented staffing guidance of Table B-1, NUREG 0654, Rev. 1, will be met by July 1, 1982. As required by this license condition Duke herein submits a description of the emergency staffing provisions for McGuire Nuclear Station.

The McGuire Nuclear Station Emergency Plan, Table 5.1-1, describes on-shift and 60 minute augmentation personnel that would be available in emergency situations. The difference between this table and Table B-1 is that the personnel listed in Table B-1 under the 30 minute category are listed under the 60 minute category in Table 5.1-1. My letter of April 3, 1981 provided the approximate response times of various personnel designated as augmenting staff for emergency situations. These personnel can respond in approximately 30 to 60 minutes. During the period before the designated augmentation personnel arrive, most of the functions and roles of Table B-1 30 minute personnel will be fulfilled by on-shift personnel as described below.

A reactor operator on-shift in excess of Technical Specification requirements will provide the Notification and Communication function of Table B-1 until the designated augmentation personnel arrive.

The Senior Health Physics Expertise of Table B-1 will be provided by the Health Physics technician required by the Technical Specifications. The person fulfilling this role will possess at least senior technician qualifications and will direct the Health Physics response until the arrival of the designated augmenting personnel.

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A Health Physics technician on-shift in excess of Technical Specification requirements will perform the In-plant Surveys function of Table B-1 until the designated augmenting personnel arrive.

The Shift Technical Advisor will be responsible for performing the core/thermal hydraulics calculations until the designated augmenting personnel arrive. This duty is consistent with the other technical support duties of the Shift Technical Advisor and will not detract from his ability to perform his advisory function.

A Health Physics technician on-shift in excess of Technical Specification requirements will perform the in-plant Radiation Protection function until the designated augmenting personnel arrive.

The remaining functions listed in the 30 minute category of Table B-1 will be performed by the augmenting personnel when they arrive in approximately 30 to 60 minutes. This 30 to 60 minute response time adequately provides for the proper functioning of the McGuire Nuclear Station Emergency Plan. The ability to provide accurate dose assessments and Health Physics protective action recommendations will not be degraded by response times of 30 to 60 minutes. In an immediate General Emergency condition, assessments and recommendations are based on in-plant radiation monitoring equipment readings and emergency procedures which incorporate both these readings and assumed worst case meterological conditions. Likewise, the ability to recover and maintain the plant in a stable condition is not degraded by a response of 30 to 60 minutes for the augresting Electrical Maintenance and Instrument and Control personnel. McGuire on-shift personnel have been trained in the use of alternate equipment if some equipment failures occur.

Duke Power Company believes that the emergency staffing provisions for McGuire Nuclear Station as described herein and in my letter of April 3, 1981 adequately satisfy the intent of NUREG 0654, Rev. 1.

Very truly yours,

William O. Parker, Jr. Ry 4/36
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cc: M. J. Graham, NRC Resident Inspector McGuire Nuclear Station

J. P. O'Reilly

U. S. Nuclear Regulatory Commission

Region II

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