

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

October 3, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Ms. E. G. Adensam, Chief
Licensing Branch No. 4

Subject: Duke Power Company
Catawba Nuclear Station
Docket Nos. 50-413 and 50-414

Dear Sir:

In accordance with the requirements of 10 CFR 50, Appendix E, Duke Power Company has conducted emergency preparedness exercises at the Oconee, McGuire, and Catawba Nuclear Stations during 1980, 1981, 1982, and 1983. These exercises have included activation of the Emergency Operations Facility at each station during each event. The experience gained over this time has placed the level of knowledge and experience of Duke's crisis management organization at a high operational state. In particular, the Crisis Management Center (Emergency Operations Facility) Staff has refined its capability to a very high level since these personnel have participated in each exercise at each station.

In 1983 with the addition of Catawba Nuclear Station, Duke Power Company will be conducting three exercises per year. Based upon the experience level described above and realizing that the turnover rate among the Crisis Management Center Staff is low, it is requested that an exemption be granted to the requirements of 10 CFR 50, Appendix E, IV.F.h as applied to the active participation of all Crisis Management Center personnel on each station's annual exercise. By letter dated January 6, 1984 this exemption request was granted for the Oconee and McGuire Nuclear Stations. Alternatively, we propose that these personnel participate in these exercises to the same degree as each station staff, i.e., one exercise per calendar year. At Duke Power Company, the Crisis Management Center Staff for all nuclear stations is composed mostly of General Office personnel whose functions in an emergency are similar to those of their day-to-day duties regardless of the nuclear station under consideration.

Subsequent to the approval of this exemption request, Duke Power Company will continue to provide adequate support by its General Office personnel to ensure effective exercises are conducted at each nuclear station. However, participation by the total Crisis Management Center Staff three times annually is deemed to be unnecessarily excessive. Participation by these personnel in only one exercise per calendar year will maintain a high degree of capability since more importance and detail will be attached to the

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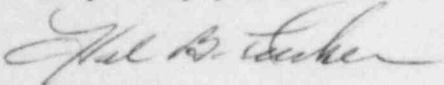
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the one annual exercise. Also, granting this exemption for Catawba would place Duke Power in a similar situation as a typical one-station/site nuclear utility insofar as the annual training provided to corresponding personnel.

Duke will activate the Crisis Management Team fully in any full-scale exercise involving full state participation. If there are no full-scale exercises planned for Duke Power nuclear stations in a calendar year, we will choose one of the local exercises in which to have the CMC fully participate.

It is requested that the appropriate NRC management personnel review this request for exemption, giving attention to the points outlined above and that a favorable response be provided to Duke Power Company in a timely manner.

Very truly yours,



Hal B. Tucker

RWO:slb

Attachment

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

NRC Resident Inspector
Catawba Nuclear Station

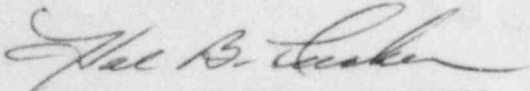
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Mr. Jesse L. Riley
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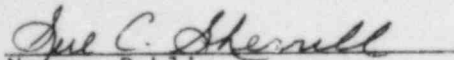
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HAL B. TUCKER, being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this request for exemption from the requirements of 10 CFR 50, Appendix E, IV.F.h as applicable; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



Hal B. Tucker, Vice President
Nuclear Production

Subscribed and sworn to before me this 3rd day of October, 1984.


Notary Public

My Commission Expires:

September 20, 1989