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Vice President

October 20, 1998

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

SUBJECT: Duke Energy Corporation
Catawba Nuclear Station Units 1 and 2
Docket Nos.: 50-413 and 50-414
Emergency Plan, Revision 98-3

Enclosed for NRC staff use and review is Revision 98-3 to the Catawba Nuclear Station Emergency Plan. This revision is effective on the date of approval.

This revision is being submitted in accordance with 10CFR50.54(q) and does not decrease the effectiveness of the Emergency Plan. A detailed revision description is provided as Attachment 1. The 10CFR50.54(q) Evaluation is provided as Attachment 2. All changes have been specifically highlighted (side-barred) to facilitate review.

By copy of this letter, two copies of this letter are being provided to the NRC, Region.

If there are any questions, please call Steve Christopher at 803-831-4027.

Very Truly yours,

G. R. Peterson
Vice President

Attachments: 1. Detailed Revision Description
2. 10CFR50.54(q) Evaluation
3. Plan Update Instructions
4. Plan Changes
5. Field Monitoring Team Radio Agreement Letters
From EPZ States/Counties

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TABLE OF CONTENTS

1. Page 4, Table of Contents
Revised the page designation for Section J.7 from J-2 to J-3. This revision was necessary due to the carryover of Section J.7 to page J-3 associated with Catawba Nuclear Station Emergency Plan Revision 98-3.

LIST OF FIGURES, TABLES, ATTACHMENTS

No changes.

INTRODUCTION

No changes.

SECTION A - ASSIGNMENT OF RESPONSIBILITY

1. Page A-5, Figure A-1, Unusual Event
Add (EOF) to the final five Unusual Event response function responsibilities in Figure A-1. Activation of the EOF is optional at an Unusual Event; however, this revision provides the responsibilities of the EOF should it be decided to activate the EOF at the Unusual Event.
2. Page A-5, Figure A-1, Note
Revise the Note to read as follows:
“(TSC) (EOF) indicates that activation of these facilities or the performance of this function is optional for the indicated emergency class.” This revision indicates that the activation of the EOF is optional at an Unusual Event.
3. Page A-2, Private Sector Section
Replace "Carolinas Emergency Medicine Specialist, P. A." with "Sterling Healthcare Group" in the Private Sector Section on Page A-2. This revision reflects the current name of the medical group associated with the Piedmont Medical Center emergency room.
4. Page A-4, Section A.3
Replace "Carolinas Emergency Medicine Specialist, P. A." with "Sterling Healthcare Group" in Section A.3 on Page A-2. This revision reflects the current name of the medical group associated with the Piedmont Medical Center emergency room.

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SECTION B - SITE EMERGENCY ORGANIZATION

1. Page B-2, Section B.5, First and Last Sentences
Replace "EP Group Manual Guideline 5.1.3" with "Emergency Plan Implementing Procedures" in the first and last sentences of Section B.5 on Page B-2. This revision reflects the transition of defining ERO position, title and major tasks from guidelines to the Emergency Plan Implementing Procedures.
2. Page B-2, Section B.7, First Paragraph, Second Sentence
Replace "EP Group Manual Guideline 5.1.3" with "Emergency Plan Implementing Procedures" in the second sentence of the first paragraph of Section B.7 on Page B-2. This revision reflects the transition of defining ERO position, title and major tasks from guidelines to the Emergency Plan Implementing Procedures.
3. Page B-3, Section B.8, The State of North Carolina, First Paragraph
Revise the first paragraph of The State of North Carolina portion of Section B.8 on Page B-3 to read as follows:
"The response by the Sate of North Carolina to an emergency development is described in the North Carolina Emergency Response Plan in Support of Catawba Nuclear Station."
This revision reflects the new title of the North Carolina response plan for Catawba Nuclear Station. This revision also reflects the separation of the Catawba and McGuire Nuclear Station response plans by the state of North Carolina.
4. Page B-7, Figure B-1, Page 1 of 2, FMT Members 75 Minute Capability for Additions
Add five asterisks following the number 4 for FMT Members shown under the column 75 Minute Capability for Additions in Figure B-1 on Page B-7. The purpose of this revision is described in the following Figure B-1 Page 2 of 2 discussion.
5. Page B-8, Figure B-1, Page 2 of 2
Add the following note to Page 2 of 2 in Figure B-1 on Page B-8:
"***** The Field Monitoring Teams respond to the OSC. The EOF assumes control of the Field Monitoring Teams upon EOF activation." This revisions clarifies the implementation of the Catawba Nuclear Site Emergency Plan in that the Field Monitoring Team personnel are expected to respond to the OSC for dispatch and that the EOF assumes control of the Field Monitoring Teams upon EOF activation. In the previous Catawba Nuclear Site Emergency Plan wording, it could be interpreted that the Field Monitoring Teams respond to the EOF.

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6. Page B-10, Figure B-3, Field Monitoring Teams
Add "(See Note)" to the Field Monitoring Teams block and the following note to Figure B-3 on Page B-10:
"NOTE: The Field Monitoring Teams respond to the OSC. The EOF assumes control of the Field Monitoring Teams upon EOF activation." This revision clarifies the implementation of the Catawba Nuclear Site Emergency Plan in that the Field Monitoring Team personnel are expected to respond to the OSC for dispatch and that the EOF assumes control of the Field Monitoring Teams upon EOF activation. In the previous Catawba Nuclear Site Emergency Plan wording, it could be interpreted that the Field Monitoring Teams respond to the EOF.

SECTION C - EMERGENCY RESPONSE SUPPORT AND RESOURCES

1. Page C-1, Section C.2.a
Replace the existing Section C.2.a on Page C-1 with the following:
"Designated work areas have been provided in the EOF for EPZ state/county Emergency Management Liaisons and EPZ state Radiation Protection Liaisons." The previous Section C.2.a referred to Section H for a description of the provisions made for the EPZ states and counties in the EOF. Upon reviewing Section H it was determined that Section H did not contain an adequate description of the provisions made for the EPZ states and counties in the EOF. This revision provides a description of the EOF provisions made for the EPZ state and county personnel.

SECTION D - EMERGENCY CLASSIFICATION SYSTEM

1. Section D, References
Replace "HP/0/B/1009/03, Health Physics Response Following A Primary To Secondary Leak" with "HP/0/B/1009/003, Radiation Protection Response Following A Primary To Secondary Leak" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format and the name change from Health Physics to Radiation Protection.
D-5, 11, 12, 13, 16, 17, 34, 35, 38, 39 and 42
2. Page D-8, References
Add "(6) AP/1(2)/A/5500/27 Shutdown LOCA" to the References Section on Page D-8. This revision adds another applicable reference for this EAL.
3. Section D
Replace "EPA 400" with "EPA-400-R-92-001" on the following pages of Section D. This revision reflects the applicable revision number associated with EPA 400.
D-27, 50, 51, 52, 53, 54, 55, 90, 91, 92 and 93

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4. Page D-37, Basis, Item 1
Replace "know" with "known" in Item 1 of the Basis Section on Page D-37. This revision corrects a typographical error.

5. Section D, References
Replace "HP/0/B/1009/10" with "HP/0/B/1009/010" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-40, 41, 42, 46, 47, 48 and 49

6. Section D, References
Replace "HP/0/B/1009/14, Health Physics Actions Following an Uncontrolled Release of Liquid Radioactive Material" with "HP/0/B/1009/014, Radiation Protection Actions Following an Uncontrolled Release of Liquid Radioactive Material" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format and the name change from Health Physics to Radiation Protection.
D-42 and D-43

7. Page D-57, Basis, Second Sentence
Replace "is" with "it" in the second sentence of the Basis Section on Page D-57. This revision corrects a typographical error.

8. Page D-3, Section D.2, Third Sentence
Replace "RP/0/A/5000/01" with "RP/0/A/5000/001" in the third sentence of Section D.2 on Page D-3. This revision reflects the new procedure numbering format.

9. Section D References
Replace "RP/0/A/5000/04" with "RP/0/A/5000/004" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-13, D-17, D-31, D-35, D-39, D-52, D-55, D-91 and D-93

10. Section D References
Replace "RP/0/A/5000/15" with "RP/0/A/5000/015" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-23, D-24 and D-25

11. Section D References
Replace "OP/0/B/6500/60" with "OP/0/B/6500/060" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-42, D-43 and D-48

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12. Page D-44, References
Replace "OP/1(2)/B/6100/10Z" with "OP/1(2)/B/6100/010Z" in the References portion of Page D-44. This revision reflects the new procedure numbering format.
13. Section D References
Replace "OP/1/B/6100/10Y" with "OP/1/B/6100/010Y" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-46, D-88 and D-89
14. Page D-52, References
Replace "HP/0/B/1003/57" with "HP/0/B/1003/057" in the References portion of Page D-52. This revision reflects the new procedure numbering format.
15. Section D References
Replace "OP/1(2)/A/6350/08" with "OP/1(2)/A/6350/008" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-72, D-73 and D-75
16. Section D References
Replace Site Directives 3.7.1, 3.7.4 and 3.7.5 with Nuclear System Directive 217 Nuclear Security Program on the following pages in the References portion of Section D. This revision reflects the transition of information from Site Directives to Nuclear System Directives (NSD).
D-78, D-79, D-81, D-82, D-85 and D-87
17. Section D References
Add RP/0/B/5000/026, "Response To Bomb Threat" in the References on the following pages in the References portion of Section D. This revision reflects the development of a specific response to bomb threat EPIP.
D-78, D-82 and D-85
18. Section D References
Replace "OP/0/A/5500/33" with "AP/0/A/5500/033" on the following pages in the References portion of Section D. This revision corrects a typographical error from a previous revision and reflects the new procedure numbering format.
D-72, D-73 and D-75
19. Section D References
Replace Site Directive 2.12.7 with Nuclear System Directive 316 on the following pages in the References portion of Section D. This revision reflects the transition of information from Site Directives to Nuclear System Directives (NSD).
D-80, D-83, D-84 and D-86

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20. Section D References
Replace "OP/1(2)//A/6100/04" with "OP/1(2)//A/6100/004" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-80, D-83, D-84, D-85, D-116, D-119 and D-120
21. Section D References
Replace "OP/1(2)/A/6100/20, Operational Guidelines For Achieving Cold Shutdown Following A Fire Event" with "OP/1(2)/A/6100/020, Operational Guidelines For Achieving Cold Shutdown Following A Fire In The Plant" on the following pages in the References portion of Section D. This revision corrects a typographical error from a previous revision and reflects the new procedure numbering format.
D-80, D-83, D-84 and D-86
22. Section D References
Replace "RP/0/A/5000/07" with "RP/0/A/5000/007" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-94, D-96, D-101, D-102, D-103, D-104, D-106, D-108, D-109, D-110 and D-112
23. Section D References
Replace "Tech. Spec. 3.3.3.3" with "Selected Licensee Commitments 16.7.2" on the following pages in the References portion of Section D. This revision reflects the transition of Seismic Monitoring information from the Technical Specifications to the Selected Licensee Commitments.
D-94, D-101 and D-106
24. Section D References
Replace "RP/0/A/5000/09" with "RP/0/A/5000/009" on the following pages in the References portion of Section D. This revision reflects the new procedure numbering format.
D-97, D-98 and D-99
25. Section D References
Replace "RP/0/A/5000/08, Chemical Spills" with "RP/0/A/5000/008, Spill Response" on the following pages in the References portion of Section D. This revision reflects the new procedure title and new procedure numbering format.
D-100, D-105 and D-111
26. Page D-47, References
Replace "OP/0/B/6500/09" with "OP/0/B/6500/059" in the References portion on page D-47 of Section D. This revision corrects a typographical error from a previous revision.

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SECTION E - NOTIFICATION METHODOLOGY

1. Page E-3, Section E.2.b, First Paragraph
Replace the first paragraph on Page E-3 to read as follows:
“The Emergency Response Organization personnel will be notified by pagers using an Alpha-Numeric message upon the initial emergency declaration. Redundant notification is provided by the on-site paging system and/or an automated telephone system which will allow timely alerting of Emergency Response Organization personnel.”
This revision clarifies the previous Catawba Nuclear Station Emergency Plan wording associated with the method of notifying the Emergency Response Organization that an emergency event has been declared.
2. Page E-4, Section E.2.c, Seventh Paragraph
Replace the seventh paragraph on Page E-4 to read as follows:
“The Emergency Response Organization personnel will be notified by pagers using an Alpha-Numeric message upon the initial emergency declaration. Redundant notification is provided by the on-site paging system and/or an automated telephone system which will allow timely alerting of Emergency Response Organization personnel.”
This revision clarifies the previous Catawba Nuclear Station Emergency Plan wording associated with the method of notifying the Emergency Response Organization that an emergency event has been declared.
3. Page E-6, Section E.2.d, Sixth Paragraph
Add a sixth paragraph on Page E-6 to read as follows:
“If initial emergency declaration, the Emergency Response Organization personnel will be notified by pagers using an Alpha-Numeric message upon the initial emergency declaration. Redundant notification is provided by the on-site paging system and/or an automated telephone system which will allow timely alerting of Emergency Response Organization personnel.”
This revision clarifies the previous Catawba Nuclear Station Emergency Plan wording associated with the method of notifying the Emergency Response Organization that an emergency event has been declared.
4. Page E-7, Section E.6, First Sentence
Add “for special facilities” following “tone alert radios” in the first sentence in Section E.6 on Page E-7. Tone alert radios are placed in special facilities as negotiated with the EPZ counties surrounding the Catawba Nuclear Site. This revision clarifies the use of tone alert radios associated with the Catawba Nuclear Station Emergency Plan.
5. Page E-8 was not revised but contains carryover from the revision on Page E-7.

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SECTION F - EMERGENCY COMMUNICATIONS

1. Page F-4, Figure F-1
Revise Figure F-1 on Page F-4. This revision reflects the current Control Room emergency communications capabilities prior to TSC activation.
2. Page F-5, Figure F-2
Revise Figure F-2 on Page F-5 with the new Figure F-2. This revision reflects the current emergency communication capabilities after TSC activation and during EOF activation.
3. Page F-6, Figure F-3
Delete the "Monitoring Teams In" block from Figure F-3 on Page F-6. Based on discussions with the EPZ states and counties surrounding the Catawba Nuclear Site it has been determined that the Catawba Nuclear Site Field Monitoring Teams are not required or desired to have the capability to communicate on the Emergency Response Radio System (low band frequency). The discussions determined that Catawba Nuclear Site Field Monitoring communications/results are evaluated by the state Radiation Protection representatives and information is then passed on to the county representatives as needed. It has been agreed to by all EPZ states and counties that the counties have no need to monitor or communicate with Catawba Nuclear Site Field Monitoring Teams. This agreement has been documented in signed letters from each EPZ state and county. These agreement letters are provided as Attachment 5 to Emergency Plan Revision 98-3. This revision reflects the agreement that Catawba Nuclear Site Field Monitoring Teams are no longer expected to have the capability to communicate with county representatives.

SECTION G - PUBLIC EDUCATION AND INFORMATION

1. Pages G-1, G-2, G-3, G-4, G-5, G-6, G-7 and G-8
Upon the review of Section G there were numerous editorial revisions identified. These revisions include changing "Site" to "Station", removing several commas, changing from upper case to lower case letters, etc. This revision has no impact on the technical requirements of Section G
2. Page G-1, Section G, First Sentence
Replace "public" with "transient" and add "emergency planning" prior to calendar inside the parenthesis in the first sentence of Section G on Page G-1. This revision clearly identifies the target audience for the annual brochures and removes the ambiguous term "public". This revision also distinguishes the calendar discussed as the emergency planning calendar to ensure that the calendar distribution discussed in the Catawba Nuclear Station Emergency Plan is not confused with other calendar distributions.

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3. Page G-3, Section G.4.a, Public Spokesperson Listing
Revise the Public Spokesperson listing in Section G.4.a on Page G-3 to read as follows:
"Primary: Vice President, Catawba Nuclear Station
Alternates: Vice President, McGuire Nuclear Station
Vice President, Oconee Nuclear Station
Executive Vice President, Nuclear Generation
General Manager, Nuclear Services
President, Duke Power"

This revision provides the current listing of qualified Public Spokespersons.

4. Page G-7, Figure G-2, EOF Public Spokesperson Senior Company Officer Description
Revise the EOF Public Spokesperson Senior Company Officer Description in Figure G-2 on Page G-7 to read as follows:
"Responds to the station and/or EOF (as directed) to fill the role of Public Spokesperson. Works with the Community Relation Manager to prepare for media interviews and news conferences. An additional Public Spokesperson may be located at the station or EOF as needed."

This revision reflects the current responsibilities of the Public Spokesperson.

SECTION H - EMERGENCY FACILITIES AND EQUIPMENT

1. Page H-4, Section H.5.b
Delete "the System Radiation Protection System Manual" from Section H.5.b on Page H-4. This revision reflects the transfer of information from the System Radiation Protection Manual to Radiation Protection procedures.
2. Page H-6 Section H.12, First Sentence
Revise the first sentence of Section H.12 on Page H-6 to read as follows:
"Duke Power Company's Emergency Operations Facility (Radiological Assessment Manager) is designated the central point for the receipt of off-site monitoring data results and sample media analysis collected by Duke personnel."
This revision clarifies the responsibilities of the Radiological Assessment Manager.

SECTION I - ACCIDENT ASSESSMENT

1. Page I-1, Section I.2b, First Paragraph
Add "with a range up to 1000R/hr that can be used to determine dose rates" following "including high-range instruments" to the first paragraph of Section I.2.b on Page I-1. Upon reviewing Section I of the Catawba Nuclear Station Emergency Plan it was determined that the reference to portable monitoring instrumentation with a range up to 1000R/hr had been incorrectly added to Section I.9 titled "Detect and Measure Radioiodine Concentration in the EPZ". This revision corrects the previous error and includes the reference to 1000 R/hr range instruments in emergency high-range instruments discussion in Section I.2.b.

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2. Page I-2, Section I.3a/I.3b, First Sentence
Revise the list of procedures in the first sentence of Section I.3.a/I.3.b on page I-2 to read as follows:
“... HP/0/B/1009/004, HP/0/B/1009/006, HP/0/B/1009/007, HP/0/B/1009/014, HP/0/B/1009/025 and HP/0/B/1009/026...”
This revision provides an individual listing of the procedure numbers for clarity and reflects the new procedure numbering format.
3. Page I-2, Section I.6
Replace “HP/0/B/1009/06” with “HP/0/B/1009/006” in Section I.6 on Page I-2. This revision reflects the new procedure numbering format.
4. Pages I-2 and I-3, Section I.7/I.8, First and Second Paragraphs
Replace “HP/0/B/1009/04” with “HP/0/B/1009/004” in the first second paragraphs of Section I.7/I.8 on Pages I-2 and I-3. This revision reflects the new procedure numbering format.
5. Page I-3, Section I.7/I.8, Third Paragraph, Last Sentence
Delete the “and counties” from the last sentence in the third paragraph of Section I.7/I.8 on Page I-3. Based on discussions with the EPZ states and counties surrounding the Catawba Nuclear Site it has been determined that the Catawba Nuclear Site Field Monitoring Teams are not required or desired to have the capability to communicate on the Emergency Response Radio System (low band frequency). The discussions determined that Catawba Nuclear Site Field Monitoring communications/results are evaluated by the state Radiation Protection representatives and information is then passed on to the county representatives as needed. It has been agreed to by all EPZ states and counties that the counties have no need to monitor or communicate with Catawba Nuclear Site Field Monitoring Teams. This agreement has been documented in signed letters from each EPZ state and county. These agreement letters are provided as Attachment 5 to Emergency Plan Revision 98-3. This revision reflects the agreement that Catawba Nuclear Site Field Monitoring Teams are no longer expected to have the capability to communicate with county representatives.
6. Page I-3, Section I.9, First Paragraph, First Sentence
Replace the first sentence of the first paragraph in Section I.9 on Page I-3 with the following:
“Appropriate instrumentation to measure radioactivity in counts per minute (cpm) and determine dose rate in mrem/hr shall be used for detection and measurement of radioiodine concentration.”
Upon reviewing Section I of the Catawba Nuclear Station Emergency Plan it was determined that the reference to portable monitoring instrumentation with a range up to 1000R/hr had been incorrectly added to Section I.9 titled “Detect and Measure Radioiodine Concentration in the EPZ”. This revision corrects the previous error and adds the correct description for the detection and measurement of radioiodine concentrations.

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7. Page I-3, Section I.9, First Paragraph, Second and Third Sentences
Reverse the order of the presentation of the second and third sentences in the first paragraph of Section I.9 on Page I-3. This revision does not make any changes other than to present the sentences in the proper sequence of first taking the air sample and then obtaining air sample results.

SECTION J - PROTECTIVE RESPONSE

1. Page J-1, Section J.2, Fourth Sentence
Replace "Power Delivery, Rock Hill Office" with "Newport Tie Station" in the fourth sentence of Section J.2 on Page J-1. This revision reflects the change of one of the site evacuation centers due to the sale of the Power Delivery, Rock Hill Office complex by Duke Power Company. The Newport Tie Station is located on property adjacent to the Power Delivery, Rock Hill Office complex property; therefore, it is not required to change the description of the location of the evacuation site as described in Section J-1.

2. Page J-2, Section J.6, Second Bullet, Third Topic, Last Sentence
Revise the last sentence in the third topic under the second bullet of Section J.6 on Page J-2 to read as follows:

"These positions are:

TSC

Operations Superintendent	Engineering Manager
Operations Engineer	Systems Support Engineer
Assistant Operations Engineer	Reactor Engineer

OSC

All positions except the OSC Status/Logkeeper"

This revision deletes the reference to a guideline to determine the TSC/OSC positions that are required to be respiratory qualified and clearly identifies the required positions in the Catawba Nuclear Station Emergency Plan. It is believed that this revision will reduce the possibility that one or all of these positions could be inadvertently removed from the respiratory qualification program in the future.

3. Pages J-3 and J-4 were not revised but contain carryover from the revision on Page J-2.

SECTION K - RADIOLOGICAL EXPOSURE CONTROL

1. Page K-2, Section K.5.a, First Sentence
Replace "the System Radiation Protection Manual" with "Radiation Protection Procedures" in the first sentence of Section K.5.a on Page K-2. This revision reflects the relocation of the actions levels for decontamination from the System Radiation Protection Manual to Radiation Protection Procedures.

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2. Page K-2, Section K.5.b, First and Second Sentences
Rewrite the first and second sentences of Section K.5.b on Page K-2 to read as follows:
“Nuclear System Directive (NSD) 507 provides generic decontamination requirements that are to be adhered to by all personnel working in all Duke nuclear facilities. Radiation Protection Procedures define specific action levels for determining the need for decontamination, define the means for decontaminating emergency personnel, describe the availability of supplies, instruments and equipment and process for waste disposal.”
This revision reflects the relocation of the actions levels for decontamination from the System Radiation Protection Manual and NSD 507 to Radiation Protection Procedures.
3. Page K-2, Section K.5.b, Last Sentence
Replace “HP/0/B/1009/08” with “HP/0/B/1009/008” in the last sentence of Section K.5.b on Page K-2. This revision reflects the new procedure numbering format.
4. Page K-2, Section K.7, First Paragraph
Revise the first paragraph of Section K.7 on Page K-2 to read as follows:
“Should non-essential plant personnel be evacuated from the site to a relocation area, provisions for extra protective clothing and decontamination of personnel have been made. Protective clothing and decontamination supplies have been placed at the relocation site.”
This revision deletes the ambiguity from the previous version of this paragraph. This revision clearly states that protective clothing is provided at the relocation site as opposed to the undefined term “extra clothing”. This revision also clearly states that decontamination supplies are provide as opposed to the undefined term “supplies”. This revision also deletes the ambiguous term “to take care of site personnel” and clearly states that provisions for decontamination of personnel have been made at the relocation sites.
5. Page K-3, Section K.7, Second Paragraph, Last Sentence
Revise the last sentence of the second paragraph of Section K.7 on Page K-3 to read as follows:
“(Procedure HB/0/B/1000/006 provides the requirement for emergency supplies to be established at the off-site relocation assembly area.)”
This revision provides the specific procedure reference, in the current procedure numbering format, that requires emergency supplies at the off-site relocation assembly area. This revision also improves the grammar of this sentence by replacing the second “provided” in the sentence with the word “established”.

SECTION L - MEDICAL AND PUBLIC HEALTH SUPPORT

No changes.

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SECTION M - RECOVERY AND REENTRY PLANNING AND POST ACCIDENT OPERATIONS

1. Page M-1, Section M.1, Third Sentence
Replace "RP/0/B/5000/025" with "RP/0/B/5000/025" and "HP/0/B/1009/01" with "HP/0/B/1009/001" in the third sentence of Section M.1 on page M-1. This revision reflects the new procedure numbering format.
2. Page M-3, Section M.2, Second Paragraph, First Sentence
Replace "organization" with "Organization" in the first sentence of the second paragraph in Section M.2 on Page M-3. This is an editorial revision.

SECTION N - EXERCISES AND DRILLS

No changes.

SECTION O - RADIOLOGICAL EMERGENCY RESPONSE TRAINING

1. Page O-1, Section O.2.a, Second Paragraph, First Sentence
Add "as identified in EP Group Manual Guideline 5.4.1" in the first sentence of the second paragraph in Section O.2.a on Page O-1. This revision identified the document that contains the Initial Training requirements for Emergency Response Organization personnel.

SECTION P - RESPONSIBILITY FOR THE PLANNING EFFORT

1. Page P-3, Figure P-1, Miscellaneous Supporting Plan Title Changes and Deletions
Revise Figure P-1 on Page P-3 as follows:
 - Replace "Station" with "Site" in Item 2 to reflect the title change of the North Carolina emergency response supporting plan
 - Replace "Radiological Emergency Response Plan" with "Emergency Operations Plan" in Item 3 to reflect the title change of the York County emergency response supporting plan.
 - Delete Items 4 (Mecklenburg County emergency response supporting plan) and 5 (Gaston County emergency response supporting plan) to reflect the incorporation of these plans in the North Carolina emergency response supporting plan.
 - Renumber the remaining items to reflect the deletion of Items 4 and 5.

**Catawba Nuclear Station
Emergency Plan Revision 98-3
Attachment 1
Detailed Revision Description**

2. Pages P-4 and P-5, Figure P-2, Procedure Titles
Revise Pages P-4 and P-5 to reflect the replacement (deletion) of RP/0/A/5000/021 with SR/0/B/2000/003. This revision reflects the development of a standard procedure for the activation of the EOF for Catawba Nuclear Site and McGuire Nuclear Site. The information guidance provided in RP/0/A/5000/021 has been incorporated into SR/0/B/2000/003.

APPENDIX 1 - DEFINITIONS

No changes.

APPENDIX 2 - METEOROLOGICAL PROGRAM

No changes.

APPENDIX 3 - ALERT AND NOTIFICATION SYSTEM DESCRIPTION

No changes.

APPENDIX 4 - EVACUATION TIME ESTIMATES

No changes.

APPENDIX 5 - AGREEMENT LETTERS

1. Page Q-5.1
Replace "Carolinas Emergency Medicine Specialist, P. A." with "Sterling Healthcare Group" on Page Q-5.1. This revision reflects the current name of the medical group associated with the Piedmont Medical Center emergency room.
2. Agreement Letter No. 1
Replace Agreement Letter No. 1 (Piedmont Medical Center) dated November 2, 1995, with the new Agreement Letter No. 1 dated October 8, 1998. This revision provides the latest agreement letter.
3. Agreement Letter No. 9
Replace Agreement Letter No. 9 (Carolinas Emergency Medicine Specialists, P. A.) dated November 2, 1995, with the new Agreement Letter No. 9 (Sterling Healthcare Group) dated October 14, 1998. This revision provides the latest agreement letter.
4. Agreement Letter No. 11
Replace Agreement Letter No. 11 (DOE - REAC/TS) dated September 27, 1995, with the new Agreement Letter No. 11 dated July 2, 1998. This revision provides the latest agreement letter.

**Catwaba Nuclear Station
Emergency Plan Revision 98-3
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Detailed Revision Description**

5. Agreement Letter No. 13
Replace Agreement Letter No. 13 (INPO) dated January 31, 1997, with the new Agreement Letter No. 13 dated January 23, 1998. This revision provides the latest agreement letter.

6. Agreement Letter No. 13
Replace Agreement Letter No. 13 (INPO) dated January 31, 1997, with the new Agreement Letter No. 13 dated January 23, 1998. This revision provides the latest agreement letter.

Attachment 2

10CFR50.54(q) EVALUATION CHECKLIST	
<p>SITE: <input checked="" type="checkbox"/> Catawba Nuclear Site <input type="checkbox"/> McGuire Nuclear Site <input type="checkbox"/> Oconee Nuclear Site</p>	<p>EVALUATION CHECKLIST APPLICABLE TO: <input checked="" type="checkbox"/> Emergency Plan Revision No: <u>Revision98-3</u> <input type="checkbox"/> Emergency Plan Implementing Procedure No: _____ <input type="checkbox"/> N/A Emergency Planning Functional Area Manual Section Number: _____ <input type="checkbox"/> N/A Other Document : _____</p>
<p>1. Does the change/revision decrease the effectiveness of the plan resulting in the loss of reasonable assurance that adequate protection can and will be taken in the event of a radiological emergency as required by 10CFR50.47(a)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>Justification for Answer (Attach additional pages as needed): (Explain how the change/revision maintains reasonable assurance of adequate protective actions. An explanation may be based on an assessment of its effects on public health and safety, a review of applicable plans, procedures, and resources, or by demonstration of the affected capabilities in a drill or exercise. Consideration should be given to any applicable site-specific planning needs.)</p> <p>See Attachment 2, Pages 3 and 4.</p>	
<p>2. Does the change/revision result in the loss of ability to meet any of the standards or applicable requirements described in 10CFR50.47(b) and the requirements in 10CFR50 Appendix E or any NRC approved alternatives to those standards and requirements? (See Page 2) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>Justification for Answer (Attach additional pages as needed): (Explain any change that reasonably brings into question the ability to meet any of the sixteen standards described in 10CFR50.47(b), and any applicable requirements of 10CFR50.47(d) or any NRC approved alternatives to those requirements.)</p> <p>See Attachment .2 Pages 5, 6, 7 and 8.</p>	
<p>3. Does this change/revision delete or contradict any regulatory requirement? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>Justification for Answer (Attach additional pages as needed): Emergency Plan Revision 98-3 complies with all regulatory requirements and does not delete nor contradicts any regulatory requirement.</p>	
<p>Prepared By: <u>BR Christoph</u></p>	<p>Date: <u>10/19/98</u></p>
<p>Reviewed By: <u>BR Mitchell</u></p>	<p>Date: <u>10/20/98</u></p>
<p>Attach description of proposed change.</p>	

Attachment 2

10CFR50.54(q) EVALUATION CHECKLIST			
10CFR50.47 (b) Review			
Does this change affect any of the following subject areas of 10 CFR 50.47(b)?			
1. Assignment of ERO responsibilities	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
2. Assignment of on-shift ERO personnel	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
3. Arrangement for utilizing State or local resources and staff	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
4. EALs	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
5. Notifications to off-site agencies, the ERO or the public	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
6. Communications between off-site agencies, the ERO, or the public	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
7. Dissemination of public information	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
8. Adequacy of emergency facilities and equipment	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
9. Methods, systems, and equipment for off-site response to a radiological emergency	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
10. Protective Action Recommendations / Determination	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
11. Emergency Worker radiological control	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
12. Medical services for contamination injured personnel	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
13. Re-entry / Recovery plans	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
14. Drills and exercises	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
15. Radiological emergency response training	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
16. Plan development, review and distribution	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No

10CFR50. Appendix E Review			
Does this change effect any of the following subject areas of 10 CFR 50, Appendix E?			
(i)(ii)(iii) Emergency plans as described in the FSAR	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
(iv) A. Organization for coping with radiological emergencies	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
(iv) B. Assessment of radiological emergencies	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
(iv) C. Classifications, EALs and ERO activation	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
(iv) D. Notification of Federal, State and local agencies and the public	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
(iv) E. ERFs, equipment, and communications	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
(iv) F. Training, drills, and exercises	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
(iv) G. Plans and procedures and surveillance of equipment and supplies	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
(iv) H. Re-entry and Recovery following an accident	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No

Comments:

See attached sheets.

Attachment 2Justification for Answer to Question 1:

Catawba Nuclear Station Emergency Plan Revision 98-3 contains the following categories of revisions. Note: These revisions are described in detail in Attachment 1 and in the Justification for Answer to Question 2.

1. Miscellaneous editorial revisions to:
 - Correct previous typographical and grammatical errors
 - Reflect procedure numbering format changes
 - Update EAL references in Section D
 - Provide user friendly communication diagrams in Section F
 - Reflect the replacement of RP/0/A/5000/021 with SR/0/B/2000/003
2. Revised Figure A-1 to discuss the responsibilities of the EOF should the option of activating the EOF be exercised during a Notification of Unusual Event.
3. Replaced the references to EP Group Manual Guideline 5.1.3 with Emergency Plan Implementing Procedures as the controlling documents that describe ERO roles, responsibilities and major tasks.
4. Revised the titles of the offsite agency supporting plans to reflect the current title.
5. Revised Section B to clarify the response of the Field Monitoring Teams.
6. Revised Section C to describe the provision made for EPZ states and counties in the EOF.
7. Revised Section E to clarify the use of pagers for ERO notification that an emergency has been declared.
8. Revised Section E.6 to specifically state that tone alert radios are located in special facilities as negotiated with EPZ counties.
9. Revised Section F and Section I to remove the requirement for EPZ counties to monitor Field Monitoring Team radio transmissions.
10. Revised the list of qualified spokespersons in Section G.
11. Revised the responsibilities for the EOF Spokesperson in Section G to reflect the current responsibilities defined by the corporate Public Affairs department.
12. Replaced references to the System Radiation Protection Manual with references to Emergency Plan Implementing Procedures due to the relocation of information from the System Radiation Protection Manual to Radiation Protection Procedures.

Attachment 2

13. Revised Section H to clarify the responsibilities of the EOF Radiological Assessment Manager.
14. Relocated the reference to a 1000 R/hr instrument from section I.9 to Section I.2b.
15. Revised Section I.9 to provide the correct description for the detection and measurement of radioiodine concentrations and rearrange the sentence in the proper sequence of first taking air samples and then obtaining air sample results.
16. Revised Section J to reflect the relocation of one of the site evacuation centers to the Newport Tie Station.
17. Revised Section J to clearly indicate the positions in the TSC and the OSC required to be respiratory qualified.
18. Revised Section K.7 to remove ambiguous terms and to provide the specific procedure used to control the supplies maintained at the site evacuation centers.
19. Revised Section O to clarify that ERO initial training requirements are contained in EP Group Manual Guideline 5.4.1.
20. Replaced the following agreement letters:
 - DOE - REAC/TS
 - INPO

The changes described above do not have an adverse impact on the ability of Catawba or any off-site agencies to reasonably assure that adequate protection can and will be taken in the event of a radiological emergency; therefore, these changes are not considered to decrease the effectiveness of the Emergency Plan.

Attachment 2Justification for Answer to Question 2

The answer to Question 2 is determined by evaluating the questions listed in the chart provided on Page 2. The following provides the evaluation of the questions on Page 2.

10CFR50.47(b)

1. Question 1 was answered Yes for the following reasons:
 - Section A was revised to discuss the responsibilities of the EOF should the EOF be activated during a Notification of an Unusual Event (NOUE). Activation of the EOF is optional during a NOUE. This revision provides clear EOF responsibilities if the decision is made to activate the EOF during a NOUE. This revision does not decrease the effectiveness of the Emergency Plan.
 - Previously the roles, responsibilities and major tasks of the ERO were described in EP Group Manual Guideline 5.1.3. Emergency Plan Implementing Procedures have been developed that now provide ERO position specific roles, responsibilities and major tasks. The Emergency Plan was revised to replace the references to EP Group Manual Guideline 5.1.3 with Emergency Plan Implementing Procedures to reflect the transfer of information from EP Group Manual Guideline 5.1.3 to the Emergency Plan Implementing Procedures. This revision does not decrease the effectiveness of the Emergency Plan.
 - Section B states that the Field Monitoring Teams are a part of the EOF organization. In reading Section B, it could have been interpreted that the Field Monitoring Teams responded to and are dispatched from the EOF. Section B was revised to clearly state that the Field Monitoring Teams respond to and are dispatched from the OSC. The EOF continues to maintain directional control of the Field Monitoring teams. This revision does not decrease the effectiveness of the Emergency Plan.
 - Information related to Radiation Protection personnel response has been relocated from the System Radiation Protection Manual to Radiation Protection Procedures, due to the relocation of information from the System Radiation Protection Manual to the Emergency Plan Implementing Procedures. The Emergency Plan was revised to replace the references to the System Radiation Protection Manual with Radiation Protection Procedures to reflect the transfer of information from the System Radiation Protection Manual to Radiation Protection Procedures. This revision does not decrease the effectiveness of the Emergency Plan.
 - Section H was revised to clarify the role of the EOF Radiological Assessment Manager with regards to off site monitoring data and sample media analysis. This revision does delete any of the previous EOF Radiological Assessment Manage responsibilities. This revision does not decrease the effectiveness of the Emergency Plan.
2. There are no Emergency Plan changes included in Revision 98-3 that affect the assignment of on-shift ERO personnel.

Attachment 2

3. There are no Emergency Plan changes included in Revision 98-3 that affect the arrangement for utilizing state or local resources and staff.
4. There are no Emergency Plan changes included in Revision 98-3 that affect the technical content of the EALs.
5. Question 5 was answered Yes for the following reasons:
 - Alpha-numeric pagers, plant PA system and an automated telephone system are used to notify ERO members when an emergency declaration has been made at the Catawba Nuclear Station. Section E was revised to clarify that alpha-numeric messages are provided on the pagers rather than the coded message used with the previous voice pagers. Section E was also revised to describe the role of the plant PA system and the automated telephone system as secondary methods for notifying ERO members. This revision does not decrease the effectiveness of the Emergency Plan.
 - Tone alert radios are provided to special facilities located within the EPZ as negotiated between the Catawba Nuclear Station and the EPZ counties. Section E was revised to specifically state that tone alert radios are provided in special facilities. In previous editions of the Emergency Plan the location of the tone alert radios had not been clearly defined. This revision does not decrease the effectiveness of the Emergency Plan.
6. Question 6 was answered Yes for the following reason:
 - Duke Power upgraded the primary Field Monitoring Team radios from a low band to a high band frequency. These new radios provide better quality and more consistent voice transmission/reception. One portion of the radio upgrade was to provide high band frequency radios to the EPZ state radiation protection agencies and the county emergency management agencies. During the distribution of the high frequency radios to the county emergency management agencies it was determined that the none of the county emergency management agencies needed or desired to monitor Field Monitoring Team radio traffic. The county emergency management agencies stated that monitoring this radio traffic was not an efficient use of county staffing resources and that any field monitoring team data needed by the county emergency management agencies would be provided by the respective state radiation protection agency. The state emergency management agencies were contacted and agreed with the county emergency management agencies. Based on the consensus of the state and county emergency management agencies (see Attachment 5 for signed agreement letters) the counties will not be provided with high band frequency radios to monitor Field Monitoring Team radio traffic. Based on the signed letters in Attachment 5, this revision does not decrease the effectiveness of the Emergency Plan.

Attachment 2

7. Question 7 was answered Yes for the following reasons:
 - The list of qualified spokespersons contained in Section G was revised to reflect the current listing maintained by corporate Public Affairs. This revision does not decrease the effectiveness of the Emergency Plan.
 - The responsibilities of the EOF Public Spokesperson contained in Section G were revised to reflect the current expectations of corporate Public Affairs. This revision does not decrease the effectiveness of the Emergency Plan.
8. Question 8 was answered Yes for the following reasons:
 - In previous editions of the Emergency Plan Section C referred to Section H for the provisions made in the EOF for EPZ state and county representatives. A review of Section H determined that there are no details describing the provisions made in the EOF. Section C was revised to clearly state the provisions made in the EOF for state and county representatives. This revision does not decrease the effectiveness of the Emergency Plan.
9. Question 9 was answered Yes for the following reasons:
 - The reference to a 1000 R/hr instrument to measure dose rate was inadvertently added to Section I.9 in a previous revision. This revision corrects the previous error and properly locates the reference to a 1000 R/hr instrument in Section I.2b. This revision does not decrease the effectiveness of the Emergency Plan.
 - In addition to removing the erroneous reference to the 1000 R/hr instrument, Section I.9 was also revised to clearly describe the process and the sequence of measuring radioiodine concentration, obtaining air samples and obtaining air sample results. This revision does not decrease the effectiveness of the Emergency Plan.
10. Question 10 was answered Yes for the following reasons:
 - Section J was revised to reflect the relocation of one of the site evacuation centers from the Rock Hill Power Delivery Office to the Newport Tie Station. The Newport Tie Station is provided with all the utilities required to serve as a site evacuation center. This revision does not decrease the effectiveness of the Emergency Plan.
 - Section K was revised to remove the ambiguous terms used in previous editions of the Emergency Plan associated with the site evacuation centers. The purpose, scope and function of the site evacuation centers were not revised. This revision does not decrease the effectiveness of the Emergency Plan.
 - Section K was also revised to provide the specific procedure reference that controls the supplies maintained at the site evacuation centers. This revision does not decrease the effectiveness of the Emergency Plan.
11. There are no Emergency Plan changes included in Revision 98-3 that affect emergency worker radiological control.
12. There are no Emergency Plan changes included in Revision 98-3 that affect the medical services for contamination injured personnel.

Attachment 2

13. There are no Emergency Plan changes included in Revision 98-3 that affect the reentry/recovery plans.
14. There are no Emergency Plan changes included in Revision 98-3 that affect the performance of drills and exercises.
15. Question 15 was answered Yes for the following reasons:
- In previous editions of the Emergency Plan there was no reference to the controlling document for the initial training requirements of ERO personnel. Section O was revised to provide a specific reference for the initial training requirements of ERO personnel. This revision does not decrease the effectiveness of the Emergency Plan.
 - Section J was revised to list the specific TSC and OSC positions required to be respiratory qualified as committed to the NRC. This revision does not decrease the effectiveness of the Emergency Plan.
16. Question 16 was answered Yes for the following reasons:
- The titles of the off site agencies supporting plans were revised throughout the Emergency Plan to reflect the current title of these supporting plans. This revision does not decrease the effectiveness of the Emergency Plan.
 - Agreement letters with offsite agencies were updated in accordance with the Emergency Plan. This revision does not decrease the effectiveness of the Emergency Plan.

10CFR50 Appendix E

- (i)(ii)(iii) There are no Emergency Plan changes included in Revision 98-3 that affect the Emergency Plan as described in Section 13.3 of the FSAR.
- (iv) A. See the response to 10CFR50.47(b) Question 1 above.
- (iv) B. See the response to 10CFR50.47(b) Question 9 above.
- (iv) C. See the response to 10CFR50.47(b) Questions 5 and 10 above.
- (iv) D. See the response to 10CFR50.47(b) Question 7 above.
- (iv) E. See the response to 10CFR50.47(b) Questions 6 and 8 above.
- (iv) F. See the response to 10CFR50.47(b) Question 15 above.
- (iv) G. See the response to 10CFR50.47(b) Question 16 above.
- (iv) H. There are no Emergency Plan changes included in Revision 98-3 that affect the reentry/recovery plans.

**Catwaba Nuclear Station
Emergency Plan Revision 98-3
Attachment 3
Plan Update Instructions**

Replace Revision 98-2 Cover Sheet with Revision 98-3 Cover Sheet

Table of Contents

Replace Pages:

- 4

List of Figures, Tables, Attachments

No Changes

Introduction

No Changes

Tab A - Assignment of Responsibility

Replace Pages:

- A-2
- A-4
- A-5

Tab B - Onsite Emergency Organization

Replace pages:

- B-2
- B-3
- B-7
- B-8
- B-10

Tab C - Emergency Response Support & Resources

Replace Pages:

- C-1

Tab D - Emergency Classification System

Replace Pages:

- D-3
- D-5
- D-8
- D-11 through D-13
- D-16
- D-17
- D-23 through D-25
- D-27
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**Catwaba Nuclear Station
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Attachment 3
Plan Update Instructions**

- D-46 through D-55
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- D-75
- D-78 through D-94
- D-96 through D-106
- D-108 through D-112
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- D-120

Tab E - Notification Methods & Procedures

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- E-3
- E-4
- E-6 through E-8

Tab F- Emergency Communications

Replace Pages:

- F-4 through F-6

Tab G - Public Education & Information

Replace Pages:

- G-1 through G-8

Tab H - Emergency Facility & Equipment

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- H-4
- H-6

Tab I - Accident Assessment

Replace Pages:

- I-1 through I-3

Tab J - Protective Response

Replace Pages:

- J-1 through J-4

Tab K - Radiological Exposure Control

Replace Pages:

- K-2
- K-3

**Catwaba Nuclear Station
Emergency Plan Revision 98-3
Attachment 3
Plan Update Instructions**

Tab L - Medical & Public Health Support

No Changes

Tab M - Recovery & Re-entry Planning

Replace Pages:

- M-1
- M-3

Tab N - Exercises & Drills

No Changes

Tab O - Radiological Emergency Response Training

Replace Pages:

- O-1

Tab P - Development, Periodic Review & Distribution of Emergency Plans

Replace Pages:

- P-3 through P-5

Tab Q - Appendices

Appendix 1 - Definitions

No Changes

Appendix 2 - Meteorological Systems

No Changes

Appendix 3 - Alert & Notification System

No Changes

Appendix 4 - Evacuation Time Estimates

No Changes

Appendix 5 - Agreement Letters

Replace Pages:

- Q-5.1

Replace Agreement Letters:

- Number 1
- Number 9
- Number 10
- Number 11
- Number 13