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February 20, 1998

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

SUBJECT.

Duke Energy Corporation Catawba Nuclear Station

Docket Nos.: 50-413 and 50-414 Emergency Plan, Revision 98-2

Dear Sir:

Enclosed for NRC staff use and review are the revised pages associated with Catawba Nuclear Station Emergency Plan Revision 98-2. 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.

Attachment 1 contains a detailed summary of the changes. Attachment 2 contains the 10CFR50.54(q) evaluation. Attachment 3 contains instructions for updating the Catawba Nuclear Station Emergency Plan. Attachment 4 contains the revised Catawba Nuclear Station Emergency Plan pages. The revised pages have been specifically highlighted (side-barred) to facilitate review.

Two copies of this letter are being provided to the NRC Region II Regional Administrator.

If you have any questions or require additional information, please contact Steve Christopher at 803-831-4027.

Sincerely,

G. R. Peterson Vice President 1045/

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Attachments: 1 - Detailed Summary of Emergency Plan Changes

2 - 10CFR50.54(q) Evaluation

3 - Emergency Plan Update Instructions

4 - Emergency Plan Changes

xc: w/attachments (2 copies)

L. A. Reyes
U. S. Nuclear Regulatory Commission
Regional Administrator, Region II
61 Forsyth Street, S. W.
Suite 23T85
Atlanta, GA 30303

(w/o attachments)

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NRC Senior Project Manager (CNS)
U. S. Nuclear Regulatory Commission
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D. J. Roberts
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Catawba Nuclear Site

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bxc: w/attachments

Electronic Licensing Library (EC050) RCG Licensing File (CN01RC)

w/o attachment

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Piedmont Municipal Power Agency 121 Village Drive Greer, SC 29651

S. R. Christopher (CN04EP) M. S. Kitlan (CN01RC) K. E. Nicholson (CN01RC) CN-750.25

TARLE OF CONTENTS

Page 5, Section N.4 Page Number
 Revised the page number for Section N.4 on Page 5 to be consistent with the current
 Section N.4 page number.

LIST OF FIGURES, TABLES, ATTACHMENTS

No change.

INTRODUCTION

No changes.

SECTION A - ASSIGNMENT OF RESPONSIBILITY No changes.

SECTION B - SITE EMERGENCY ORGANIZATION No changes.

SECTION C - EMERGENCY RESPONSE SUPPORT AND RESOURCES No changes.

SECTION D - EMERGENCY CLASSIFICATION SYSTEM

1. Page D-102, Second EAL

Removed the words "Approaching hurricane with" from the second EAL on Page D-102. This revision was performed based on feedback Emergency Planning received from the Operator Licensing Examinations. The intent of this EAL is to classify the event when the defined winds are sustained on-site for greater than 15 minutes. During the Operator License Examinations, more than one Operator interpreted the words, "Approaching hurricane with", to mean that the event should be classified based on the National Weather Service projected storm path, projected wind strengths and prior to arrival of the defined winds on-site. The Operators classified the event while the winds were 150 miles (six hours travel time) from the site. The Operators' interpretation were graded as a misclassification. This revision provides clarification of this EAL and is consistent with the wording of the current Unusual Event EAL for sustained winds shown on Page D-96 of the Emergency Plan. This EAL revision has been reviewed and agreed to by the states and counties associated with the Catawba Nuclear Site EPZ.

2. Page D-109, EAL

Removed the words "Approaching hurricane with" from the EAL on Page D-109. This revision was performed based on feedback Emergency Planning received from the Operator Licensing Examinations. The intent of this EAL is to classify the event when the defined winds are sustained on-site for greater than 15 minutes. During the Operator License Examinations, more than one Operator interpreted the words, "Approaching hurricane with", to mean that the event should be classified based on the National Weather Service projected storm path, projected wind strengths and prior to arrival of the defined winds of site. The Operators classified the event while the winds were 150 miles (six hours travel time) from the site. The Operators' interpretation were graded as a misclassification. This revision provides clarification of this EAL and is consistent with the wording of the current Unusual Event EAL for sustained winds shown on Page D-96 of the Emergency Plan. This EAL revision has been reviewed and agreed to by the states and counties associated with the Catawba Nuclear Site EPZ.

SECTION E - NOT) FICATION METHODOLOGY No changes.

SECTION F - EMERGENCY COMMUNICATIONS No changes.

SECTION G - PUBLIC EDUCATION AND INFORMATION No changes.

SECTION ** - EMERGENCY FACILITIES AND EQUIPMENT No changes.

SECTION I - ACCIDENT ASSESSMENT No changes.

SECTION J - PROTECTIVE RESPONSE

1. Page J-8, Figure J-2
Replaced "(EMF53A and EMF53B)" with "(EMF53A AND/OR EMF53B)" in Figure J-2 on Page J-8. As originally written, Figure J-2 could be interpreted that both EMF53A and EMF53B were required to exceed the defined R/HR values listed in Figure J-2 to identify fission product inventory inside Containment greater than gap activity. This interpretation would be incorrect. If either or both EMF53A and EMF53B exceed the I AR values defined in Figure J-2, fission product inventory inside Containment would be greater than gap activity. This revision clarifies the use

of EMF53A and EMF53B to determine if fission product inventory inside Containment is greater than gap activity. This revision also provides consistency between Section J of the Emergency Plan and RP/0/A/5000/005, "General Emergency."

SECTION K - RADIOLOGICAL EXPOSURE CONTROL No changes.

SECTION L - MEDICAL AND PUBLIC HEALTH SUPPORT No changes.

SECTION M - RECOVERY AND REENTRY PLANNING AND POST ACCIDENT OPERATIONS

No changes.

SECTION N - EXERCISES AND DRILLS

Page N-1, Section N.2
 Add the following sentence to Section N.2 on Page N-1:

"Catawba Nuclear Station will conduct drills in accordance with the requirements of 10CFR50, Appendix E."

This revision ensures that drills conducted between biennial NRC evaluated exercises are performed in accordance with 10CFR50 Appendix E Section IV.F.2.b.

SECTION O - RADIOLOGICAL EMERGENCY RESPONSE TRAINING No changes.

SECTION P - RESPONSIBILITY FOR THE PLANNING EFFORT No changes.

SECTION Q - APPENDICES No changes.

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
No changes.

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Enclosure 5.2 Page 1 of 5

CATAWBA NUCLEAR SITE 10CFR50.54 (q) EVALUATION CHECKLIST

Emergency Plan Revision: 98-2

SECTION 1

Does the Emergency Plan change decrease the effectiveness of the Emergency 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)?

_____YES __X__NO

Justification for Answer:

Catawba Nuclear Station Emergency Plan Revision 98-2 contains the following categories of revisions. These revisions are described in detail in Attachment 1 and do not result 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).

- Editorial change to correct a page number in the Table of Contents.
- Removed the words "Approaching hurricane with" from the applicable EALs associated with Event Category 4.1.9, "Natural Disasters and Other Hazards." This revision provides clarification of the intent of the EAL and is consistent with the wording of the current Unusual Event EAL for sustained winds shown on Page D-96 of the Emergency Plan. These EAL revisions have been reviewed by the states and counties associated with the Catawba Nuclear Site EPZ.
- Added the word "OR" to Figure J-2 to clarify the use of EMF53A and EMF53B when determining if fission product inventory in Containment is greater than gap activity. This revision also provides consistency between the Emergency Plan and RP/0/A/5000/005, "General Emergency."
- Added a statement to Section N.2 to ensure that drills conducted between NRC evaluated exercises are performed in accordance with 10CFR50 Appendix E Section IV.F.2b.

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CATAWBA NUCLEAR SITE 10 CFR 50.54 (q) EVALUATION CHECKLIST

SECTION 2

Does the Emergency Plan change result in the loss of ability to meet the any of the standards described in 10CFR50.47(b) or the requirements described in 10CFR50 Appendix E or any NRC approved alternatives to those standards and requirements?

_____YES __X_NO

Justification for Answer:

(The following questions summarize the standards and requirements found in 10CFR50.47(b) and 10CFR50 Appendix E and should be used to support Section 2. Yes answers to any of the following questions should be fully explained as to why the Emergency Plan change does not result in the loss of the ability to meet the standard or requirement.)

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

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CATAWBA NUCLEAR SITE 10CFR50.54 (q) EVALUATION CHECKLIST

- Question 4 was answered yes because this Emergency Plan revision contains revisions to the EALs. The EAL revisions provide clarity and were made to provide consistency between Section D of the Emergency Plan and applicable Emergency Response Implementing Procedures. These EAL revisions have been reviewed by the states and counties associated with the Caiwba Nuclear Site EPZ. The EAL revisions do not result in the loss of ability to meet 10CFR50.47(b).
- Question 14 was answered Yes because this Emergency Plan revision contains a revision to Section N.2 of the Emergency Plan. A statement was added to Section N.2 to ensure that drills conducted between NRC evaluated exercises are performed in accordance with 10CFR50 Appendix E Section IV.F.2.b. The revision to Section N.2 does not result in the loss of ability to meet 10CFR50.47(b).

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CATAWBA NUCLEAR SITE 10 CFR 50.54 (q) EVALUATION CHECKLIST

Does this change effect any of the following subject areas of 10 CFF	8 50, A	pendix	E?	
(i)(ii)(iii) Emergency plans as described in the FSAR		Yes	X	No
(:v) A. Organization for coping with radiological emergencies	market secondary	Yes	X	No
(iv) B. Assessment of radiological emergencies	X	Yes		No
(iv) C. Classifications, EALs and ERO activation	X	Yes		No
(iv) D. Notification of Federal, State and local agencies and the public		Yes	X	No
(iv) E. ERFs, equipment, and communications		Yes	X	No
(iv) F. Training, drills, and exercises	X	Yes		No
(iv) G. Plans and procedures and surveillance of equipment and supplies		Yes	×	No
(iv) H. Re-entry and Recovery following an accident		Yes	X	No

- 1. Question (iv) B was answered yes because the word "OR" was added to Figure J-2. The revision to Figure J-2 clarifies the use of EMF53A and EMF53B when determining if fission product inventory in Containment is greater than gap activity. This revision also provides consistency between the Emergency Plan and RP/0/A/5000/005, "General Emergency." The revision to Figure J-2 does not result in the loss of ability to meet the requirements described in 10CFR50 Appendix E.
- Question (iv) C was answered yes because this Emergency Plan revision contains revisions to the EALs. The EAL revisions provide clarity and were made to provide consistency between Section D of the Emergency Plan and applicable Emergency Response Implementing Procedures. These EAL revisions have been reviewed by the states and counties associated with the Catwba Nuclear Site EPZ. The EAL revisions do not result in the loss of ability to meet the requirements described in 10CFR50 Appendix E.
- Questions (iv) F were answered yes because Section N.2 of the Emergency Plan was revised. A statement was added to Section N.2 to ensure that drills conducted between NRC evaluated exercises are performed in accordance with 10CFR50 Appendix E Section IV.F.2.b. The revision to Section N.2 does not result in the loss of ability to meet the requirements described in 10CFR50 Appendix E.

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CATAWBA NUCLEAR SITE 10 CFR 50.54 (q) EVALUATION CHECKLIST

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10	C	110	J.D	1 3

Does the Emergency Plan change delete or contradict any regulatory requirement? YES X NO

Justification for Answer:

This evaluation did not identify any instances where Emergency Plan Revision 98-2 would delete or contradict any regulatory requirement.

Attach additional pages as required.

Prepared By: Stere Works Date: 2/17/98

Reviewed By: Date: 2/18/98

CATAWBA NUCLEAR STATION EMERGENCY PLAN REVISION 98-2 ATTACHMENT 3 EMERGENCY PLAN UPDATE INSTRUCTIONS

Replace Revision 98-1 Cover Sheet with Revision 98-2 Cover Sheet

Table of Contents
Replace page 5

List of Figures, Tables, Attachments No changes.

Introduction No changes.

Tab A - Assignment of Responsibility No changes.

Tab B - Onsite Emergency Organization No changes.

Tab C - Emergency Response Support & Resources No changes.

Tab D - Emergency Classification System
Replace pages D-102
D-109

Tab E - Notification Methods & Procedures No changes.

Tab F- Emergency Communications
No changes.

Tab G - Public Education & Information No changes.

Tab H - Eme: gency Facility & Equipment No changes.

CATAWBA NUCLEAR STATION EMERGENCY PLAN REVISION 98-2 ATTACHMENT 3 EMERGENCY PLAN UPDATE INSTRUCTIONS

Tab I - Accident Assessment No changes.

Tab J - Protective Response Replace page J-8

Tab K - Radiological Exposure Control No changes.

Tab L - Medical & Public Health Support No changes.

Tab M - Recovery & Re-entry Planning No changes.

Tab N - Exercises & Drills Replace page N-1

Tab O - Radiological Emergency Response Training No Changes

Tab P - De relopment, Periodic Review & Distribution of Emergency Plans No changes.

Tab Q - Appendices No changes.

Appendix 1 - Definitions No changes.

Appendix 2 - Meteorological Systems No Changes

CATAWBA NUCLEAR STATION EMERGENCY PLAN REVISION 98-2 ATTACHMENT 3 EMERGENCY PLAN UPDATE INSTRUCTIONS

Appendix 3 - Alert & Notification System No changes.

Appendix 4 - Evacuation Time Estimates No changes.

Appendix 5 - Agreement Letters No changes.