



FEMA

April 12, 2022

Mr. Jessie F. Quichocho, Chief
Reactors Licensing Branch
Division of Preparedness and Response
Office of the Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Ref: REQUEST FOR FEDERAL EMERGENCY MANAGEMENT AGENCY
CONSULTATION ON THE DUKE ENERGY PROPOSAL TO RELOCATE THE
CONSOLIDATED EMERGENCY OPERATIONS FACILITY (Accession No.
ML21348A003)

Dear Mr. Quichocho:

On February 2, 2022, the FEMA Radiological Emergency Preparedness (REP) program received a request for assistance from the U.S. Nuclear Regulatory Commission (NRC) regarding Duke Energy's request to relocate an emergency operation facility (EOF). The request for assistance specifically asked FEMA to review and provide initial concurrence that the proposed Duke Energy EOF relocation does not have any unintended negative impact on office radiological emergency preparedness plans.

Assessment

FEMA consulted with the states of North Carolina and South Carolina regarding their concurrence with the EOF relocation. David Thompson, Director of Nuclear Emergency Preparedness for Duke Energy, requested that the state emergency management agencies provide written acknowledgement and concurrence regarding the proposed move of the Charlotte EOF. Within said letter, Duke Energy stated that a secured location had been sited that provided easy access from Interstate 85, and provided the similar resources as the existing EOF to include:

- The proposed EOF continues to remain outside of the 10-mile emergency planning zone from each Duke Energy Nuclear site to minimize the disruption of EOF operation in the event of a site radiological release, loss of electrical power, or security threat;
- The proposed EOF will include state-of-the-art technological equipment, promoting reliability and functionality for the long-term future;
- The proposed EOF will continue to have backup power and communications capabilities;
- Continued seating capacity to support state emergency management directors and radiological support staff; and

- Continued common EOF procedures and training to provide consistent staff response to any emergency.

Through concurrence signed by Director Michael Sprayberry, Director of North Carolina Emergency Management, dated July 24, 2021, and Director Kim Stenson, Director of South Carolina Emergency Management Division, dated November 4, 2021, it was acknowledged that any impacts of the proposed relocation had been reviewed against the respective state Radiological Emergency Preparedness Program (REPP) plans. Duke Energy is planning a demonstration drill at the proposed EOF on April 27, 2022, which will involve simultaneous events at two nuclear power reactor sites. The drill at each site will involve activation of the emergency response organization and facilities, offsite notifications, dose assessment, protective action recommendations, and field monitoring team coordination. Duke Energy will provide the opportunity for respective state representatives responding to the Duke Energy EOF to participate and for NRC and FEMA to observe the drill at the new facility.

Based upon offsite response organization concurrence received from the states of North Carolina and South Carolina, and review of the memorandum of understanding between FEMA and the NRC, FEMA concurs that the proposed Duke Energy EOF relocation does not have an unintended negative impact on offsite radiological emergency preparedness plans.

If you have any questions or concerns, please feel free to contact me at 202-657-2301 or Craig Fiore at 202-280-9303.

Sincerely,

Thomas Warnock
Chief
Radiological Emergency Preparedness Branch

Cc: Kevin Wells, FEMA Region IV
Craig Fiore, FEMA HQ