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December 13, 2012

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555


Subject: Duke Energy Carolinas, LLC  
Oconee Nuclear Station, Units 1, 2, and 3  
Docket Nos. 50-269, -270, -287  
Emergency Plan, Volume A, Revision 2012-04

Please find attached for your use and review copies of the revision to the Oconee Nuclear Station Emergency Plan.

This revision is being submitted in accordance with 10 CFR 50.54(q) and does not reduce the effectiveness of the Emergency Plan or the Emergency Plan Implementing Procedures. By copy of this letter, two copies of this revision are being provided to the NRC, Region II, Atlanta, Georgia.

If there are any questions or concerns pertaining to this submittal, please call Patrick M. Street, Emergency Planning Manager, at 864-873-3124.

Sincerely,

  
T. Preston Gillespie, Jr.  
Vice President  
Oconee Nuclear Station

Attachments:  
Revision Instructions  
Emergency Plan Revision 2012-04  
50.54(q) Evaluation(s)

AX45  
NRC

U. S. Nuclear Regulatory Commission  
December 13, 2012  
Page 2

xc: (w/2 copies of attachments)

Mr. V. M. McCree  
U.S. Nuclear Regulatory Commission - Region II  
Marquis One Tower  
245 Peachtree Center Ave., NE, Suite 1200  
Atlanta, GA 30303-1257

w/copy of attachments

Mr. John Boska, Project Manager  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike - Mail Stop 8G9A  
Rockville, MD 20852  
(Send via E-mail)

w/o attachments

NRC Senior Resident Inspector  
Oconee Nuclear Station

December 13, 2012

OCONEE NUCLEAR STATION

SUBJECT: Oconee Nuclear Site Emergency Plan  
Volume A, Revision 2012-04

Please make changes to the Emergency Plan, Volume A by following the below directions.

**REMOVE**

Cover Sheet 2012-03

List of Effective Pages -  
Revision 2012-03

Record of Changes  
- Revision 2012-03

Section B - Rev. 2011-02

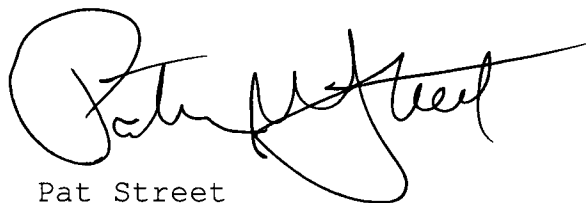
**INSERT**

Cover Sheet 2012-04

List of Effective Pages -  
Revision 2012-04

Record of Changes  
- Revision 2012-04

Section B - Rev. 2012-04

A handwritten signature in black ink, appearing to read "Pat Street", with a large, stylized loop at the beginning and a long horizontal stroke extending to the right.

Pat Street  
Emergency Planning Manager  
Oconee Nuclear Station



## **OCONEE NUCLEAR STATION EMERGENCY PLAN**



### **APPROVED:**

T. Gillespie  
**T. Preston Gillespie, Jr.**  
**VP, Oconee Nuclear Station**

10 DEC 12  
**Date Approved**

12/13/2012  
**Effective Date**

**VOLUME A  
REVISION 2012-04  
DECEMBER 2012**

December 13, 2012

OCONEE NUCLEAR STATION

SUBJECT: Oconee Nuclear Site Emergency Plan  
Volume A, Revision 2012-04

Please make changes to the Emergency Plan, Volume A by following the below directions.

**REMOVE**

Cover Sheet 2012-03

List of Effective Pages -  
Revision 2012-03

Record of Changes  
- Revision 2012-03

Section B - Rev. 2011-02

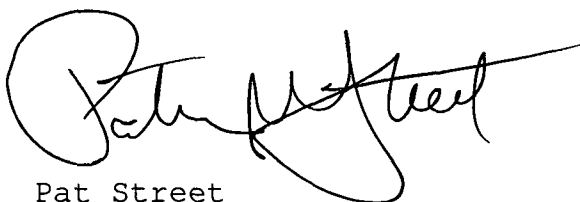
**INSERT**

Cover Sheet 2012-04

List of Effective Pages -  
Revision 2012-04

Record of Changes  
- Revision 2012-04

Section B - Rev. 2012-04

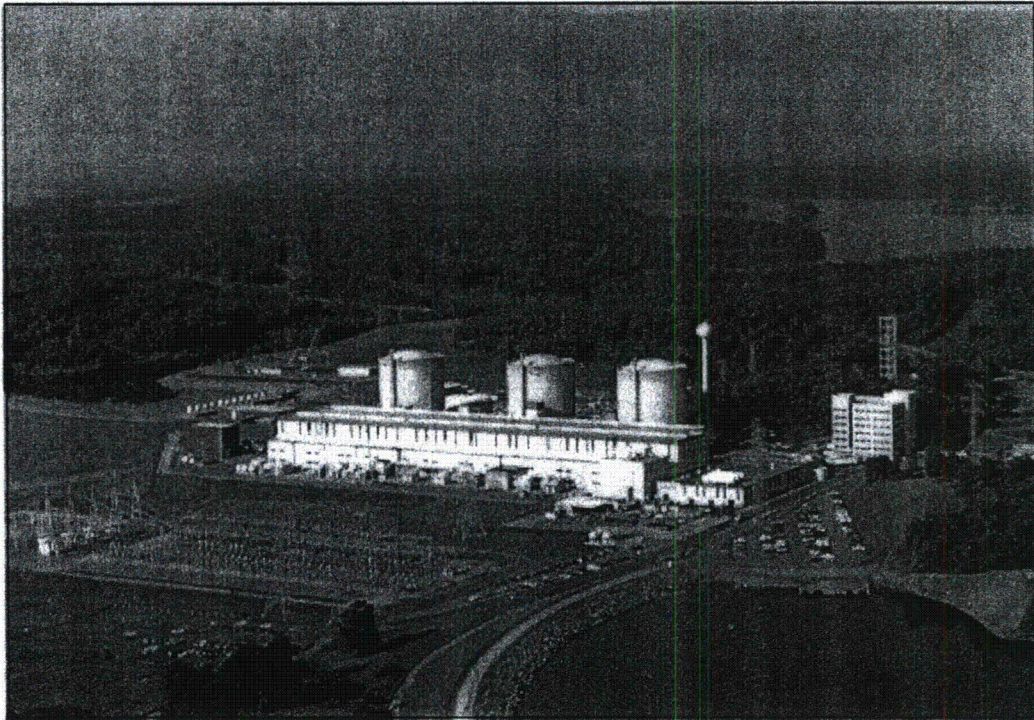
A handwritten signature in black ink, appearing to read 'Pat Street', with a large, stylized initial 'P' and a long horizontal stroke extending to the right.

Pat Street  
Emergency Planning Manager  
Oconee Nuclear Station





## OCONEE NUCLEAR STATION EMERGENCY PLAN



### APPROVED:

T. Preston Gillespie, Jr.  
T. Preston Gillespie, Jr.  
VP, Oconee Nuclear Station

10 DEC 12  
Date Approved

12/13/2012  
Effective Date

VOLUME A  
REVISION 2012-04  
DECEMBER 2012

# Oconee Emergency Plan List Of Effective Pages

<u>SECTION</u>	<u>PAGE NUMBER</u>	<u>REVISION NO.</u>	<u>DATE</u>
Emergency Plan Approval Cover Sheet Coversheet		Rev 2012-04	December 2012
List of Effective Pages	Page 1 - 4	Rev. 2012-04	December 2012
List Of Figures	Page 1 - 6	Rev. 2008-02	October 2008
Record Of Changes	Page 1 - 9	Rev. 2012-04	December 2012
Table of Contents	Page 1	Rev. 2008-02	October 2008
I. Introduction	Page i-1 - i-6a	Rev. 2008-02	October 2008
II. Planning Standards & Evaluation Criteria			
A. Assignment of Responsibility	Page A-1 - A-8	Rev. 2010-01	February 2010
B. Onsite Emergency Organization	Page B-1 - B-21	Rev. 2012-04	December 2012
C. Emergency Response Support And Resources	Page C-1 & C-2	Rev. 2012-02	June 2012
D. Emergency Classification System	Page D-1 - D-100	Rev. 2012-02	June 2012
E. Notification	Page E-1 & E-2	Rev. 2008-02	October 2008
F. Emergency Communications	Page F-1 - F-8	Rev. 2012-01	June 2012
G. Public Information and Education	Page G-1 - G-5 2011 Emergency Planning Calendar	Rev 2011-01 Rev. 2011-01	May 2011 May 2011
H. Emergency Facilities And Equipment	Page H-1 - H-39	Rev. 2012-02	June 2012
I. Accident Assessment	Page I-1 - I-37	Rev. 2012-02	June 2012
J. Protective Response	Page J-1 - J-24	Rev. 2012-02	June 2012

**Oconee Emergency Plan  
List Of Effective Pages**

<u>SECTION</u>	<u>PAGE NUMBER</u>	<u>REVISION NO.</u>	<u>DATE</u>
<b>K. Radiological Exposure Control</b>	Page K-1 - K-12	Rev. 2008-02	October 2008
<b>L. Medical And Public Health Support</b>	Page L-1 - L-5	Rev. 2009-01	February 2009
<b>M. Recovery And Reentry Planning And Post-Accident Operations</b>	Page M-1 - M-5	Rev. 2008-02	October 2008
<b>N. Exercises and Drills</b>	Page N-1 - N-5	Rev. 2011-01	May 2011
<b>O. Emergency Response Training</b>	Page O-1 - O-3	Rev. 2008-02	October 2008
<b>P. Responsibility For The Planning Effort: Development, Periodic Review and Distribution Of The Emergency Plans</b>	Page P-1 - P-8	Rev. 2012-02	June 2012
 <b>III. APPENDICIES</b>			
<b>APPENDIX 1 Definitions</b>	Page 1 - 5	Rev. 2012-02	June 2012
<b>APPENDIX 2 Meteorology And Offsite Dose Assessment Program</b>	Page 1 -4	Rev. 2008-02	October 2008
<b>APPENDIX 3 Alert And Notification System Description</b>	Page 1 - 4	Rev. 2008-02	October 2008
<b>APPENDIX 4 Evacuation Time Estimates</b>	Page 1	Rev. 2008-02	October 2008



# Oconee Emergency Plan List Of Effective Pages

## APPENDIX 5 Letters of Agreement

Page 1	Rev. 2011-01	May 2011
Page 2	Rev. 2011-01	May 2011
Agreement Letter 1	Rev. 2008-02	February 19, 2008
Agreement Letter 2	Rev. 2008-02	February 15, 2008
Agreement Letter 3	Rev. 2008-02	February 19, 2008
Agreement Letter 4	Rev. 2008-02	February 25, 2008
Agreement Letter 5 Page 1, 2, & 3	Rev. 2008-02	April 25, 2008
Agreement Letter 6 Page 1 & 2	Rev. 2010-01	February 23, 2010
Agreement Letter 7	Rev. 2008-02	July 28, 2008
Agreement Letter 8	Rev. 2010-01	April 16, 2009
Agreement Letter 9	Rev. 2008-02	February 22, 2008
Agreement Letter 10	Rev. 2008-02	February 19, 2008
Agreement Letter 11 Page 1 & 2	Rev. 2008-02	April 28, 2008
Agreement Letter 12 Page 1 & 2	Rev. 2004-01	November 29, 2001
Agreement Letter 13 Page 1 & 2	Rev. 2010-01	September 21, 2009
Agreement Letter 14 Page 1, 2, & 3	Rev. 2010-01	June 02, 2009
Agreement Letter 15 Page 1, 2 & 3	Rev. 2010-01	June 5, 2009
Agreement Letter 16	Rev. 2011-01	September 30, 2010
Agreement Letter 17 DELETED	Rev. 2004-01	DELETED - 08/26/03
Agreement Letter 18	Rev. 2010-01	September 04, 2009

# Oconee Emergency Plan List Of Effective Pages

Agreement Letter 19	Rev. 2008-02	June 27, 2008
Agreement Letter 20 Page 1 thru 5	Rev. 2010-01	January 05, 2010
Agreement Letter 21 Page 1 thru 6	Rev. 2008-02	August 6, 2008
Agreement Letter 22 Page 1 thru 5	Rev. 2010-01	June 22, 2009
Agreement Letter 23	Rev. 2010-01	April 16, 2009
Agreement Letter 24	Rev. 2008-02	June 27, 2007
Agreement Letter 25	Rev. 2012-03	May 23, 2012
Agreement Letter 26	Rev. 2012-03	June 06, 2012

## APPENDIX 6 Distribution List

Page 1 - 6	Rev. 2008-02	October 2008
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## APPENDIX 7 Emergency Data Transmittal System

Page 1	Rev. 2012-01	June 2012
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## APPENDIX 8 Spill Prevention Control Spill Prevention Control And Countermeasure Plan Site Drawing

Page 1 - 36	Rev. 2004-02	December 2004
Drawing	Revision 2001-03	October 2001

## APPENDIX 9 Ground Water Monitoring Sampling And Analysis Plan

Page 1 - 17	Rev. 2008-02	December 2007
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## APPENDIX 10 Hazardous Materials Response Plan

Page 1 - 12	Rev. 2010-01	February 2010
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## RECORD OF CHANGES

<u>REVISION NUMBER</u>	<u>EFFECTIVE DATE</u>	<u>REASON FOR REVISIONS</u>
Revision 1	April 1, 1981	Meteorological Update
Revision 2	December 31, 1981	Rewrite Emergency Plan in Nureg 0654 Format
Revision 3	March, 1982	Update Emergency Plan
Revision 4	April, 1982	Revisions & Changes to update Emergency Plan
Revision 5	September 1, 1982	Revision to coincide with Crisis Management Plan
Revision 6	November 1, 1982	Revision update
Revision 7	December 14, 1982	Review and update
83-1	June 10, 1983	Changes required by action items due to annual exercise and review and general update
83-2	November 17, 1983	Changes required by review and general update
84-1	March 26, 1984	Revisions as determined by QA audit and minor editing
84-2	November 15, 1984	Revisions as determined by annual review
85-1	June 7, 1985	Revisions/changes/editing
85-2	-----	Revisions/changes/editing-annual review
86-1	March 8, 1986	New Oconee Brochure
86-2	November 13, 1986	Revisions/changes/editing-annual review
86-3	December 9, 1986	Correct changes identified as deficiencies by the NRC in Rev. 85-2.
87-1	February 4, 1987	Revision update, minor editing changes, included failed fuel accident assessment information.

RECORD OF CHANGES (Continued)

<u>REVISION NUMBER</u>	<u>EFFECTIVE DATE</u>	<u>REASON FOR REVISIONS</u>
87-2	-----	Revision update, minor editing changes Review Section D. Agreement letters updated.
87-4	December 10, 1987	Incorporate alternate TSC and OSC into Emergency Plan
88-1	June 7, 1988	Revised EALS in Section D.
88-2	October 14, 1988	Annual review. Minor editorial revisions.
89-1	February 28, 1989	Major revision to Section D. Added Appendix 7. Minor editorial changes.
89-2	August 14, 1989	Change to Section D. Minor editorial revisions.
89-3	January 5, 1990	Annual Review.
90-1	March 1, 1990	Changes to Section D as required by NRC commitment.
90-2	June 1, 1990	Changes reflect upgrade of radiation monitor system and minor editing.
90-3	July 2, 1990	Change to Section D, Emergency Classification.
90-4	October 31, 1990	Annual Review
91-1	January 21, 1991	Section D revision. (RIA upgrade)
91-2	February 20, 1991	Section D revision. (TS to SLC)
91-3	March 22, 1991	Section D revision. (RIA upgrade) Section D revision. (SLB revision)
91-5	September 19, 1991	Section D revision. (RIA upgrade)
91-6	December 16, 1991	Annual review.
92-1	March 1, 1992	Section D (RIA upgrade). Minor editorial changes.
92-2	June 30, 1992	Major Revision
92-3	October 29, 1992	Annual review



**RECORD OF CHANGES (Continued)**

<b><u>REVISION NUMBER</u></b>	<b><u>EFFECTIVE DATE</u></b>	<b><u>REASON FOR REVISIONS</u></b>
92-4	12/31/92	Section B, D, H, J, Appendix 4, 5 & 6 changes.
93-1	03/01/93	Sections D, G, H, N, P, and Appendix 6
93-2	05/07/93	Sections A, B, D, Appendix 5 and 6
93-3	07/23/93	Sections A, B, G, H, I, J, L, M, N, & Appendix 6
93-4	08/11/93	Sections B, D, and Appendix 5
93-05	01/01/94	Annual Review, Incorporation of EPA-400 guidelines.
94-01	03/15/94	Additions of Appendix 8 and 9. - (Minor revisions)
94-02	05/09/94	Changes to Appendix 5, Pages 1 and 2; Changes to Appendix 6, Pages 2 and 4; State of South Carolina Agreement Letter
94-03	05/25/94	Changes to Appendix 5, Page 2; Changes to Appendix 6, Pages 4 and 5; INPO Agreement Letter
94-04	06/06/94	Changes to Appendix 5, Page 2; Change Teledyne Isotopes Badge Service Service Company
94-05	08/08/94	Changes to Section D
94-06	12/29/94	Annual review. Editorial changes, minor revisions.
95-01	02/23/95	Changes to Sections B, G, Appendix 5.
95-02	10/23/95	Annual review and changes
95-03	11/01/95	Section D. Change, Incorporated new EAL'S.
95-04	12/31/95	Calendar 1996, HAZMAT Changes, RP/14 deleted
96-01	02/13/96	Changes to Sections B, D, and N.
96-02	06/25/96	Changes to Section D
96-03	07/96	Changes to Section D
96-04	12/96	Annual review, editorial changes, minor changes with major change to Appendix 10.

## RECORD OF CHANGES

REVISION NUMBER	EFFECTIVE DATE	REASON FOR CHANGE
97-01	07-97	Section B, I, Appendix 5 & 7, with editorial/minor changes to Section H & P
97-02	12-97	Annual review and editorial/minor changes
98-01	02-98	Section D, page 35. Correction of title on Enclosure 4.3
98-02	03-98	Section N, page 1 & 2, Added part a (General) to Section N.2 to ensure drills conducted between NRC evaluated exercises are performed in accordance with 10CFR50, Appendix E, Section IV.F.2.b
98-03	04-98	List of Figures page number corrections, Added Emergency Operation Facility to Figure H-15, Figure H-20 reformatted. Added Agreement Letter with Keowee-Key Volunteer Fire Department, Appendix 5, #24. Appendix 10 - Hazardous Materials Response Plan, corrections on Table of Contents with minor revisions. Headings on Appendix 10, Figure 2 with minor revisions.
98-04	12-98	Annual review and editorial/minor changes.
99-01	03-99	<p>The ONS Technical Specifications have been converted to a set of Technical Specifications based on NUREG 1430. "Standard Technical Specifications Babcock and Wilcox Plants."</p> <p>Replaced the description phrases (titles) in Section D for Operating Modes with the Mode number from Improved Technical Specifications. In Section I the portion describing leak rate volume percent per day was changed to percent of the containment air weight per day. The reference to Tech Spec 4.4.1.1 was changed to reference Improved Technical Specification 5.5.2.</p> <p>NOTE: The implementation date of Improved Tech Specs was moved from March 4, 1999 to March 27, 1999, therefore the revision date for revision 99-01 will depict February when the actual administrative changes were completed.</p>
99-02	12-99	Annual review and editorial/minor changes
2000-01	04-2000	Addition of List of Effective Pages
2000-02	05/2000	Editorial /minor changes
2000-03	12/2000	Annual review and editorial/minor changes
2001-01	02/07/2001	Additions and corrections as result of 50.54(t) audit.

## RECORD OF CHANGES

REVISION NUMBER	EFFECTIVE DATE	REASON FOR CHANGE
2001-02	08/2001	Additional information added to Basis Document and additional EAL's resulting from EP drill critiques. Changes in areas of responsibility. Added note concerning RVLS to Fission Product Barrier Matrix; 2001 calendar; information added to EP Functional Area Manual; added/updated information on annual average meteorology; Appendix 5; Appendix 6; editorial/minor changes.
2001-03	12/2001	Added information in Basis Document concerning a reactor building containment break. Replaced the 2001 calendar with the 2002 calendar. Editorial/minor changes
2002-01	01/02	The present Oconee Nuclear Station Emergency Operating Procedure is written in a different format and with some different terms than the earlier version. The term PTS (Pressurized Thermal Shock) has replaced TSOR (Thermal Shock Operating Range). This is only a change in terminology.
2002-02	06/02	The additional EAL is to ensure a site specific credible threat results in a declaration of a notification of Unusual Event (NOUE). This change is also intended to achieve an appropriate level and consistent response Nationwide. Section B - minor changes; Section D - Added information requested by Emergency Coordinators to Enclosure 4.1; Section G - Rewrite of entire section; Section H - Updated information on Figure H-4 relating to Met Data; Appendix 5 - Updated Letters of Agreement; and miscellaneous spelling/grammar errors.
2002-03	09/02	Section A - Compliance with the NRC Security Interim Compensatory Measure (ICM) issued 02/25/02; Section P - Audit frequencies per revised 10 CFR 50.54 (t) as stated in Federal Register Vol 64, 03/29/99. Appendix 1 - Added definition of monthly and Semi-Annual; Appendix 5, Agreement Letters, updated #17, Appendix 6 - Changed name on 78A. Miscellaneous corrections.
2003-01	02/03	Section D - RIA setpoints change, Section G - 2003 Calendar, Appendix 3 - Siren upgrade, new map (i-5) ; Appendix 5 - Agreement Letters,
2003-02	08/03	Appendix 6 - Issued To change, Section B, E, F editorial/minor changes Section D - incorporates additional guidance for the Emergency Coordinator/EOF Director related to classification of a high energy line break, such as a Main Steam Line Break. In addition, Section D has been retyped using a consistent font style - no changes in content resulted from the retype.
2004-01	02/04	Incorporates a retype of the majority of the sections as an editorial change to adopt a consistent format: Section G - Added information concerning One Mile Exclusion Area Signs; Section H - Strip Chart Recorders were removed under an NSM; Section J - Incorporated guidance on the use of KI as a protective action recommendation; Section K - changed KI dose to 5 REM CDE from 25 REM; Appendix 4 - Incorporate results of Evacuation Time Estimate; Appendix 5 - Revised Agreement Letters

## RECORD OF CHANGES

REVISION NUMBER	EFFECTIVE DATE	REASON FOR CHANGE
2004-02	12/21/04	Editorial changes to correct typos, drawings, and title/organizational names. This revision also incorporates clarifying information from the latest Evacuation Time Estimate (ETE); clarification of offsite agency responsibilities for protective actions for impediments and special populations; revised EAL #2 for Enclosure 4.3, Unusual Event IC #2; clarification of ERO activation after normal working hours; and revisions to the site's SPCC Plan included in Appendix 8. In addition to these changes, applicable references have replaced generic references in Figure P-1. This revision also incorporates the 2005 Calendar distributed to the 10 mile EPZ population.
2005-01	02/01/05	Section D, Enclosure 4.7, Page 66 - Duke Power Hydro-Electric Group has revised the Lake Keowee water level from 807 to 815.5 feet for initiating a Condition B. This elevation is used in Enclosure 4.7 for classifying the event as an Unusual Event. The Hydro -Electric Group notifies the Control Room when Condition B has been declared. No protective actions by the plant are changed.
2005-02	05/17/05	Section I & Letters of Agreement - Incorporates an editorial revision that describes the makeup of Field Monitoring Teams and updated Agreement Letters. 1.7&8 replaced "...personnel from Radiation Protection and Chemistry." with "...a RP Technician and a Driver." Editorial Change - Chemistry personnel no longer perform the function of FMT Driver. FMT Drivers are now provided by other groups.
2005-03	08/24/05	Revision 2005-03 incorporates an addendum for the Fire Department/Volunteer Fire Department Agreement Letters. This addendum was added as a result of NRC guidance provided to utilities. The addendum to these letters provides guidance on the use of the Incident Command System at ONS and identifies the ONS Fire Brigade Leader as the on-scene commander and site-interface for responding offsite fire departments.
2005-04	09/15/05	Revision 2005-04 is a change to Page 66, Enclosure 4.7, Emergency Action Levels #1 - Reservoir elevation greater than or equal to 807.0 feet with all spillway gates open and the lake elevation continues to rise. This change undoes Revision 2005-01 which changed Keowee Lake level from 807 feet elevation to 815.5 feet elevation. This revision was determined to be a non conservative change in that it delayed the Unusual Event emergency classification. Appendix 5, Agreement Letter #21 has been updated.
2005-05	01/09/06	Revision 2005-05 incorporates editorial changes that clarify organizational charts/responsibilities, revise procedure references, replaces public information calendar, and replaces obsolete survey instruments. Agreement Letters #16 and #19 were updated.
2006-03	06/8/06	Section D - Change #1 Revised initiating condition #2 for the Alert classification for Enclosure 4.6 (Fire/Explosions and Security Events). This change is based on a correction to the NEI White Paper, Enhancements to Emergency Preparedness Programs For Hostile Actions which was endorsed in a letter from the NRC on December 8, 2005. Change #2 - Renumbered Emergency Action Levels throughout Section D to match the numbering scheme found in RP/0/B/1000/001



## RECORD OF CHANGES

### REASON FOR CHANGE

REVISION NUMBER	EFFECTIVE DATE	
		(Emergency Classification) procedure - Renumbering makes it easier for procedure users to locate the correct emergency action level in the Basis Document. - Appendix 5 - Agreement Letters #8, 14,15 & 23 were updated.
2006-04	11/06	Reference changes to the deletion of the Clemson EOF and incorporates reference to the Charlotte EOF. In addition, miscellaneous editorial changes are included in this revision.
2007-01	03/07	Appendix 5 Agreement Letters that have been updated/revised.
2007-02	12/07	Editorial changes including a revised 50 mile radius map (Figure B), a revision to the Emergency Classification Basis Section D , the 2008 Emergency Planning Calendar, a revised layout drawing for the JIC, a revised listing of portable survey instruments, the latest renewal of existing agreement letters and a revised Ground Water Monitoring Plan
2008-01	09/08	The original order of the EALs created a human performance trap. The first fission barrier column that the procedure user reviews is the RCS Barrier column which is on the left side of the page. The second fission barrier column that is reviewed is the Fuel Clad Barrier which is in the center of the page. This order gives the procedure user the mind set that the EALs are listed in the same order: RCS EAL followed by the Fuel Clad EAL. Changing the order of the EALs is not a deviation from the approved EAL scheme but is a difference. This change does not constitute a decrease in the effectiveness of the EPLAN since the EALs are exactly the same.
2008-02	10/08	As of this change 2008-02, the Emergency Plan is now available on NEDL/SCRIBE and has been completely re-issued. All changes in the future to the Emergency Plan will be completed thru NEDL/SCRIBE. The following Agreement Letters were also updated: 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 19 and 21.
2009-01	02/09	Revised existing information relating to organization names that have changed, removed specific names and replaced with a title to mitigate the need for future revisions due to personnel changes, and changed staging location names based on changes made to area designation names; however staging will still occur in same area. Changes made only reflect actual organization names, functional position names, and current location names being used to make the E-Plan more accurately reflect current information. No changes are being made to the process or conduct of the how the E-Plan is to be implemented
2010-10	02/10	Revised existing information relating to changes made to the callback system, who performs the dose assessments, the basis information for the Containment Barrier EAL based on NEI 99-01 Rev 5 FAQ lessons learned. Made name change for Oconee Medical Center, corrected information relating to testing frequency for major elements referenced in the E-Plan, the new neutron instrument used by radiation protection, and street name change for figure H-3A. Changes made are the result of the Annual Review process and no changes are being made to the process or conduct of how the E-Plan is to be implemented. The following Agreement Letters were also updated: Number - 6, 8, 13, 14, 15, 16, 18, 20, 22, & 23.

## RECORD OF CHANGES

### REASON FOR CHANGE

REVISION NUMBER	EFFECTIVE DATE	REASON FOR CHANGE
2011-01	05/11	Figure B-10 - Redistribution of support for Field Monitoring Teams from Chemistry to Business Management and Work Control. Section D - Basis corrected to delete reference to USFAR Table 15-114 which has been deleted, revised ICs 4.3.A.3 and 4.4.A.3, EAL A to align with RP/0/B/1000/001, revised ICs and EALs to add levels of operating modes that represent the operating levels of hot shutdown, cold shutdown and hot standby were listed, added "AC" back to IC 4.5.A.1 where it had been inadvertently deleted, add SSF to IC 4.6.U.1, correct IC 4.5.G.1, EAL 1 to reflect SSF maintaining Mode 3 (hot standby) rather than hot shutdown, add new ICs for Jocassee Dam condition A and B declarations, correct misprint in IC 4.7.A.2, EAL B, correct formatting errors, and add Security EALs. Section F - deleted onsite areas requiring phone notifications for site assembly due to new wireless system being installed in those areas. Section G - replace 2010 calendar with 2011 calendar. Figure H-1 - revised room layout to reflect current arrangement. Section N - Revised the testing cycle for the EPLAN from a 5 year cycle to a 6 year cycle. Appendix 5 - update letters of agreement.
2011-02	10/11	This evaluation supports a request to revise the Oconee (ONS), McGuire (MNS), and Catawba (CNS) Emergency Plans to allow for an alternate approach for compliance with 10 CFR 50.47(b)(2) relative to meeting the minimum staffing requirement during emergencies for site Radiation Protection (RP) personnel and the Emergency Operations Facility (EOF) position staffing to that in Table B-1 in NUREG-0654, endorsed by Regulatory Guide 1.101.
2012-01	06/12	Section F - A change to the process for answering the 4911 emergency phone calls. The new process will have both Operations and Security(SAS) answering the phone. Appendix 7 -Will clarify the ERDS related system description verbiage from the modem based data transfer system to the new VPN System.
2012-02	06/12	The NRC published Federal Register notice [RIN 3150-A110], "Enhancements to Emergency Preparedness Regulations" on November 23, 2011. The amendments contained in the rule are summarized as twelve (XII) topics with varying implementation due dates. Emergency Plan changes to the following sections (C, D, H, I, J, P, and Appendix 1) are made in accordance with the rule and the appropriate guidance documents pertaining to Topic V – Emergency Action Level for Hostile Action, Topic VI – Emergency Declaration Timeliness, Topic VIII – Emergency Operation Facility (Performance Based), Topic IX – Emergency Response Organization Augmentation at Alternate Facility, and Topic XI – Protective Actions for On-site Personnel.
2012-03	06/13	Added Agreement Letter 25 - G&G Metal Fabrication to provide Hale pump technical support and Agreement Letter 26 Operating Agreement between Duke Energy's Lincoln Combustion Turbine Facility & MNS, CNS and ONS Nuclear Supply Chain concerning an Emergency Supply of Diesel Fuel.

## RECORD OF CHANGES

<u>REVISION NUMBER</u>	<u>EFFECTIVE DATE</u>	<u>REASON FOR REVISIONS</u>
2012-04	12/12	Section B - This change is to incorporate the new staffing analysis for the new EP rule and editorial changes.

## B. ONSITE EMERGENCY ORGANIZATION

Adequate staffing to provide for initial emergency response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.

### B.1. Emergency Response Organization

Figures B-1 through B-6 shows the Oconee Nuclear Site Emergency Response Organization that would be established during an incident along with the duties the different groups would assume. Designation of personnel to the Emergency Response organization is determined by the particular job expertise of an individual. This assures that these personnel are qualified to carry out their responsibilities during an emergency. The normal staffing assignments at the Oconee Nuclear Site include emergency response responsibilities. See Figures B-10 for emergency responsibilities for designated groups.

The Emergency Response Organization is outlined in Division/Section Directives. These directives establish the duties, responsibilities and alternates for each required emergency response position. Response procedures have been established for each section through these Directives.

### B.2. Emergency Coordinator - (24 hour)

As a result of training and day-to-day experiences in the normal operating mode at the Oconee Nuclear Site, the Operations Shift Manager will assume authority and responsibility for any emergency that may arise at the site. He will assume control of the situation, alert and warn personnel and others, take necessary onsite remedial action, obtain necessary outside aid and notify management and appropriate offsite agencies. The authority vested in this position by Duke Energy management enables the Operations Shift Manager to declare an emergency as necessary to protect the plant, site personnel, and the general public. He is vested with the authority to provide protective action recommendations to state and local agencies for implementing offsite emergency measures.

The Operations Shift Manager will continue with these responsibilities until relieved by the Station Manager (alternate).



### B.3. Alternates for Emergency Coordinator

In an emergency situation where the Station Manager/Emergency Coordinator is unavailable, for whatever reason, and an acting Station Manager has not been designated in writing, an alternate will be contacted. Alternates are personnel with intimate knowledge of plant operations and will fulfill the position as TSC Emergency Coordinator when assigned duty. Alternates are designees appointed by the Station Manager.

**Note: Emergency Telephone Directory, provides names, home addresses and phone numbers for the Emergency Coordinators listed above.**

### B.4. Functional Responsibilities of the Emergency Coordinator

Figure B-5 defines the duties and responsibilities of the Emergency Coordinator within the emergency response organization.

The Emergency Coordinator and the EOF Director are the individuals responsible for making protective action recommendations to the state and county agencies. Once the Emergency Operations Facility is activated, only the EOF Director has this responsibility. Prior to the activation of the EOF, the Emergency Coordinator is responsible for making protective action recommendations, classifying/ downgrading/ escalating/terminating events, and approving notification forms to offsite agencies. These responsibilities may not be delegated.

### B.5. Minimum Staffing Requirements for Nuclear Power Plant Emergencies

Figure B-8(a/b) identifies the positions by title and major tasks to be performed by the persons assigned to the functional areas of emergency activity within 45 to 75 minutes. The TSC and OSC will be activated within 75 minutes of event classification. The EOF (Figure B-9) will also be staffed and operational by a minimum staff within 75 minutes of event classification.

A detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in Figure B-8a is located in ONS-OSSA-12212012 Rev: 0.

### B.6. Interface - Onsite, Offsite Organizations

(Figure A-1) shows the interfaces between and among the onsite functional areas of emergency activity, site support, local services support, and State and Local government response organizations. The onsite Technical Support Center, Operational Support Center, and the Emergency Operations Facility is shown.

B.7 Minimum Staffing Requirements - Corporate Level

Personnel from the corporate location will provide assistance to the Oconee Nuclear Station in the areas of dose assessment, coordination of news media and severe accident analysis. These people will respond on an as needed basis.

The Emergency Response Facility Organization is shown on Figures B-4A through B-4D. Division/Section Directives detail the emergency response organization and are included as implementing procedures.

Should an event occur at another Duke Energy nuclear facility concurrent with an event at Oconee Nuclear Site, additional resources would be required to support the EOF Organization. Figure B-11 shows the supplemental EOF organization that would be required to manage a multi-site event. An additional Assistant EOF Director would function as the lead manager to support the second site. The EOF Director would have overall emergency management responsibility for both events.

B.8 Contractor/Private Organizations - Technical Assistance

Private Contractors and/or companies that would be available to augment and support the emergency organization:

Waste Management	Chem Nuclear
Bartlett Nuclear	Emergency Equipment Supplier
SEG	(e.g. Safe Industries, Inc.)
Alaron	AREVA

Additional groups that could respond to emergencies would be contacted by the Site Services Group who are represented at the Emergency Operations Facility.

B.9 Local Agency Support

Agreements with local agency support groups have been made to assist the Oconee Nuclear Site during emergency situations.

POLICE -

Oconee Sheriff's Department

Pickens Sheriff's Department

S. C. Highway Patrol

S. C. Law Enforcement Division

AMBULANCE -

Oconee Medical Center - Emergency Medical Services

MEDICAL -

Blue Ridge Emergency Physicians

Oconee Medical Center

FIRE-FIGHTING -

Oconee Rural Fire Association

Keowee-Ebenezer Fire Department

Corinth-Shiloh Fire Department

Six-Mile Fire Department

Keowee Fire Department

RADIOLOGICAL MONITORING -

Pickens County Emergency Management Agency

Oconee County Emergency Management Agency

EVACUATION OF POPULATION -

Oconee County Emergency Management Agency

Pickens County Emergency Management Agency

HOSPITAL -

Oconee Medical Center

USE OF BUILDINGS -

Oconee County School District

Pickens County School District

**FIGURE B-1**  
**OCONEE NUCLEAR STATION**  
**EMERGENCY RESPONSE ORGANIZATION**  
**FUNCTIONAL AREAS OF EMERGENCY RESPONSE**

1. Emergency Response Coordination
  - Operations Shift Manager
  - Station Manager
  - Division Managers
  - Section Managers
2. Plant Systems Operations
  - Superintendent of Operations
  - Operations Shift Managers
  - Operations Engineers
  - On Shift Staff (Operations)
  - Engineering
3. Accident Assessment
  - Emergency Coordinators
  - Operations Shift Managers
  - Operations Engineers
  - Shift Managers
  - Site Engineering
  - Severe Accident Analysis Group (GO)
4. Radiological Environmental Survey and Monitoring
  - Contract service
  - Radiation Protection Section
5. First Aid/Rescue, Firefighting
  - Medical Emergency Response Team Members
  - Fire Brigade
6. Personnel Monitoring
  - Radiation Protection Section
7. Decontamination
  - Radiation Protection Section



**FIGURE B-1**  
**OCONEE NUCLEAR STATION**  
**EMERGENCY RESPONSE ORGANIZATION**

8.     Security of Plant and Access Control  
        Duke Security (ONS and Oconee JIC)  
        Building Security/Access & Control (Charlotte EOF)
9.     Repair/Corrective Actions  
        Nuclear Supply Chain  
        Site Services Group
10.    Personnel Accountability  
        Division Managers  
        Section Managers  
        Supervisors  
        Duke Security
11.    Radiological Accident Assessment  
        Radiation Protection Section (ONS/GO/CNS/MNS)  
        Site Engineering  
        Operations Group  
        Chemistry Group  
        Severe Accident Analysis Group (GO)
12.    Communications  
        Operations  
        Safety Assurance  
        Training  
        Nuclear Assurance
13.    Radiation Protection Section  
        Radiation Protection Section
14.    Plant Chemistry  
        Chemistry Group

**FIGURE B-1**  
**OCONEE NUCLEAR STATION**  
**EMERGENCY RESPONSE ORGANIZATION**

- 15.   Radwaste Operations  
        Chemistry Group
- 16.   Technical Support  
        Site Engineering
- 17.   Manpower Planning and Logistical Support  
        Work Control Group  
        Nuclear Supply Chain  
        Site Services Group
- 18.   Public Information  
        Corporate Communications - Joint Information Center
- 19.   Licensee Representative to State County EOC  
        Site Engineering

FIGURE B-2  
DUKE ENERGY COMPANY  
OCONEE NUCLEAR STATION  
TECHNICAL SUPPORT CENTER ORGANIZATION CHART

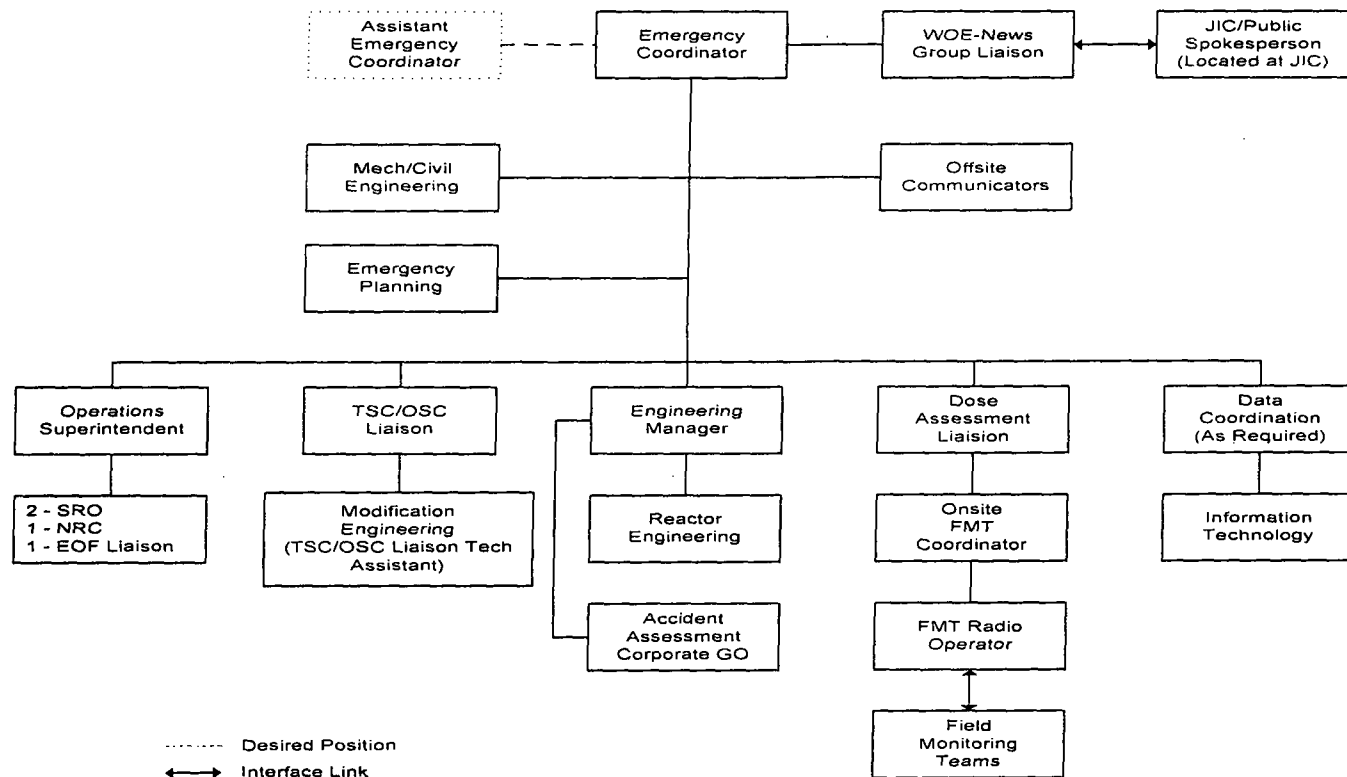
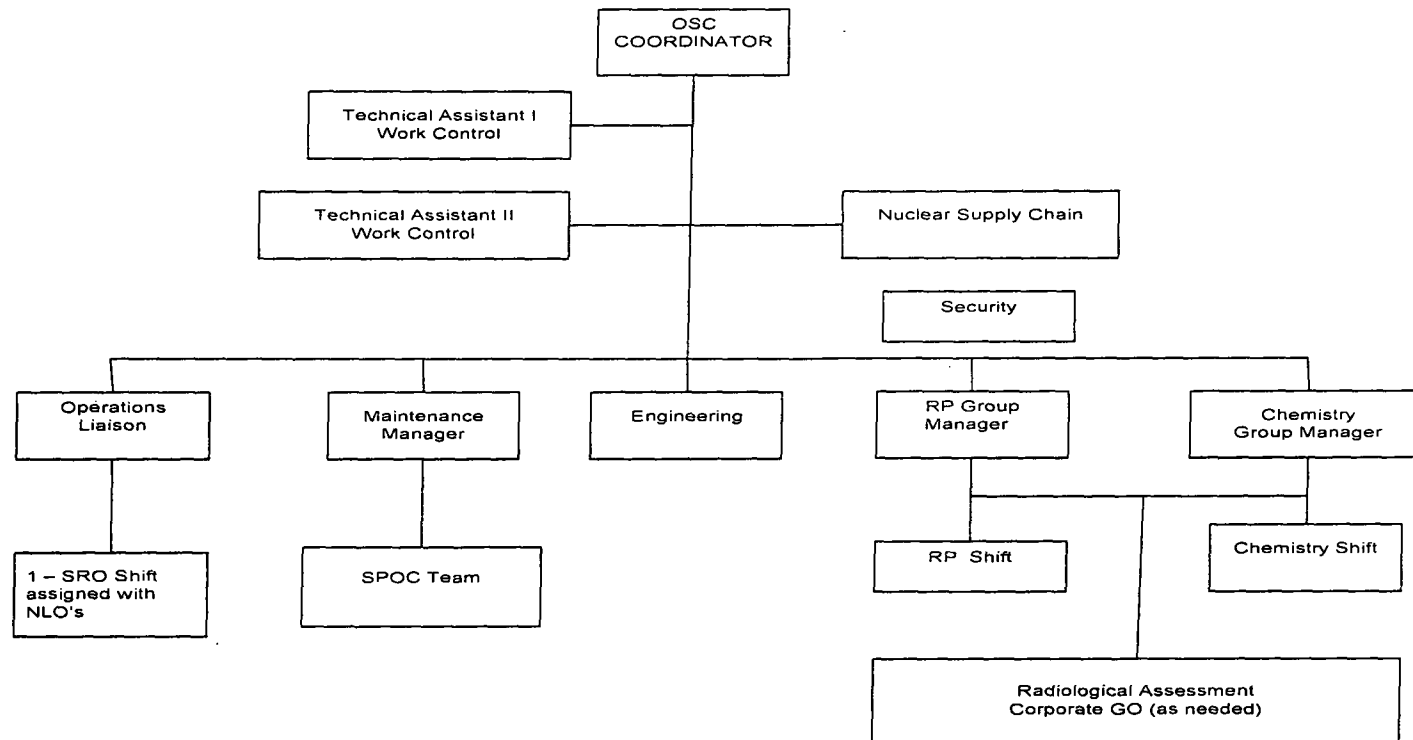


FIGURE B-3  
DUKE ENERGY COMPANY  
OCONEE NUCLEAR STATION  
OPERATIONAL SUPPORT CENTER ORGANIZATION CHART  
OPERATIONAL SUPPORT CENTER



**FIGURE B-4A**  
**OCONEE NUCLEAR STATION**  
**Emergency Operations Facility**

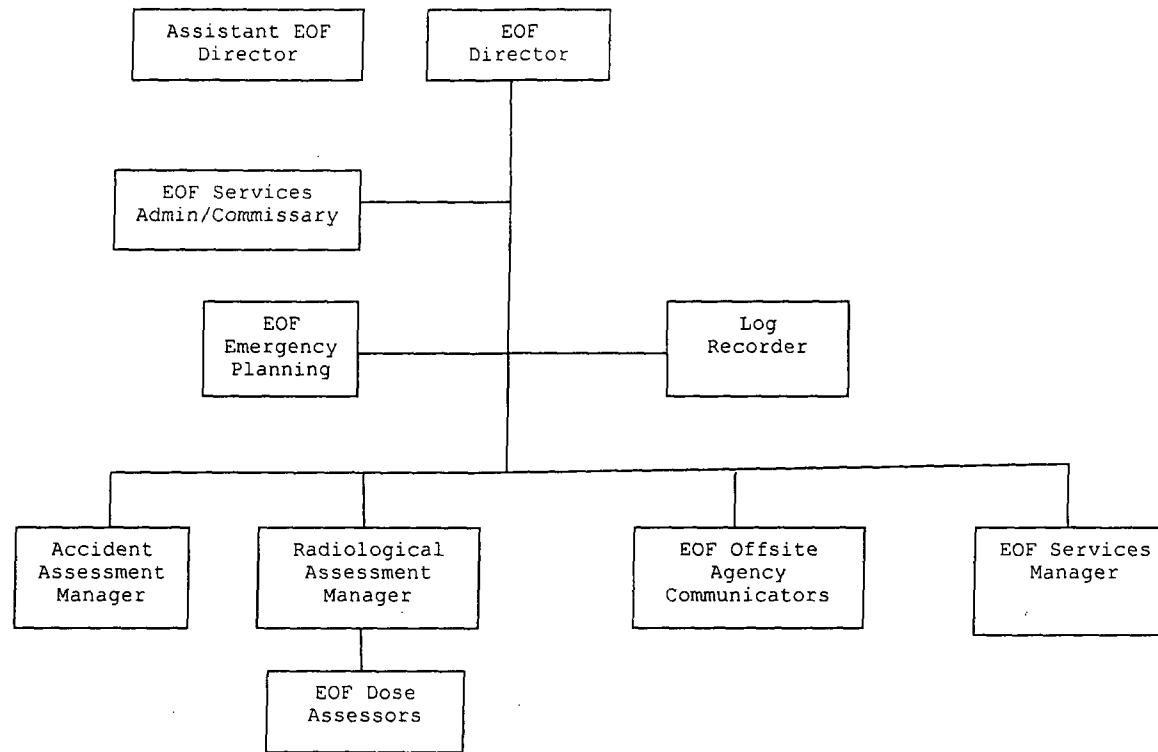
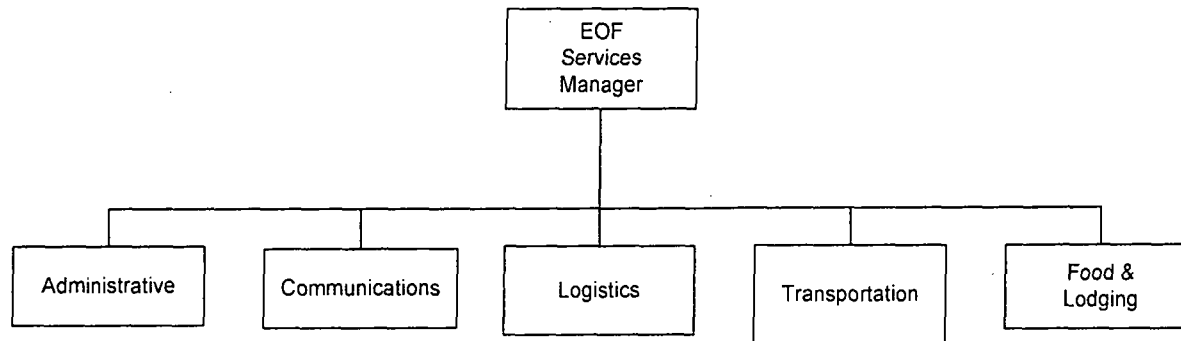
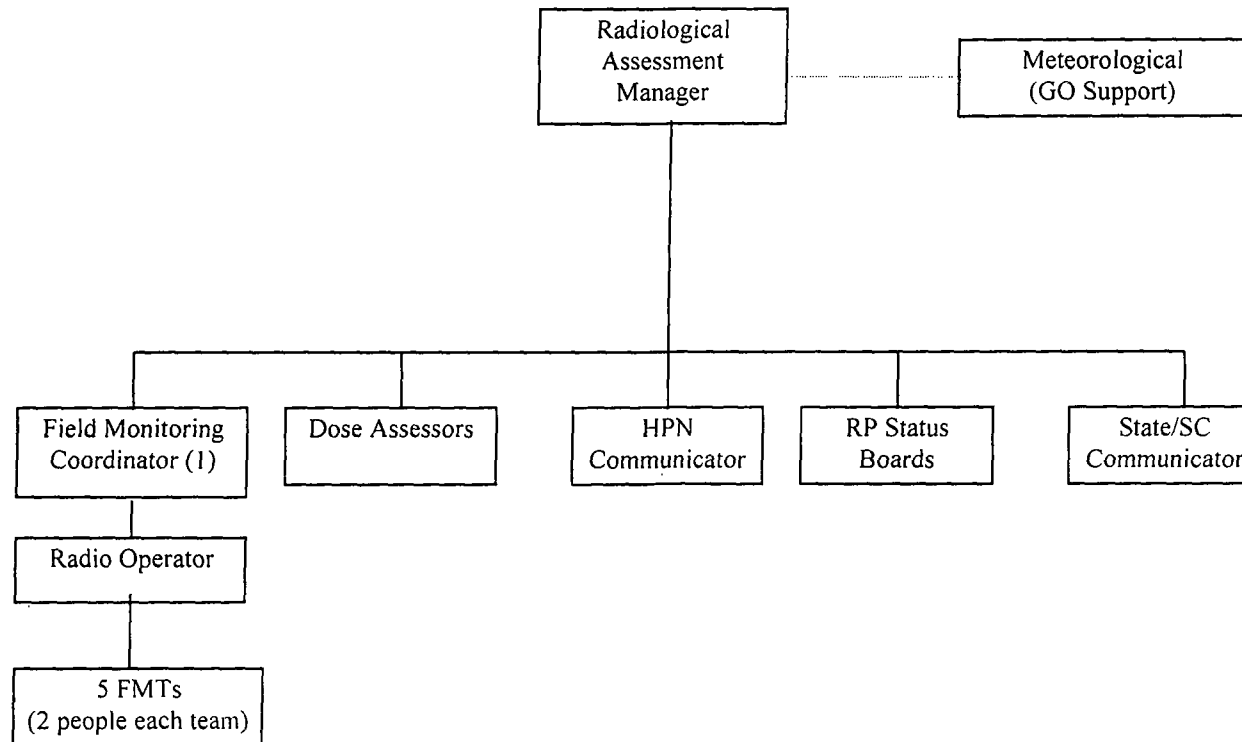


FIGURE B-4B  
DUKE ENERGY COMPANY  
OCONEE NUCLEAR STATION  
EMERGENCY OPERATIONS FACILITY



**FIGURE B-4C**  
**OCONEE NUCLEAR STATION**  
**EMERGENCY OPERATIONS FACILITY**



**FIGURE B-5**  
**OCONEE NUCLEAR STATION**  
**EMERGENCY COORDINATOR DUTIES**

Duties and Responsibilities:

1. Activate the Emergency Response Organization (Technical Support Center, Operational Support Center and the Emergency Operations Facility).
2. Coordinate technical assistance for remedial actions to mitigate circumstances surrounding plant operations.
3. Designate individual to communicate with offsite agencies promptly. Approve all information released via the emergency notification form. Approval (signature) of contents of message form may not be delegated to others in the emergency organization.
4. Initiate emergency actions within the provisions of the Oconee Nuclear Site Emergency Plan.
5. Classify emergency events. Escalate/de-escalate or terminate from an emergency status if the Emergency Operations Facility is not operational. Responsibility may not be delegated.
6. Make senior technical and management staff available onsite for consultation with NRC and State on periodic basis if EOF has not been activated.
7. Coordinate all emergency actions concerning the technical aspects of the corrective actions taken within the Technical Support Center.
8. Evacuate all non-essential personnel on site if a radiological emergency exists. Be aware of exposure guidelines of personnel.
9. Recommend protective action guides for the safety and welfare of the public to the appropriate offsite agency if the Emergency Operations Facility/EOF Director is not in a position to do so. This authority may not be delegated.
10. Authorize exposures in excess of routine yearly exposure limits for lifesaving and equipment repair missions in accordance with RP/0/B/1000/11. This responsibility can be delegated to the RP Manager in the OSC.



**FIGURE B-6**  
**OCONEE NUCLEAR STATION**  
**EMERGENCY OPERATIONS FACILITY DIRECTOR**

Duties and Responsibilities:

1. Overall Management of the offsite emergency response activities of Duke Energy (Oconee Nuclear Site).
2. Recommend protective action guides for the safety and welfare of the public to the appropriate offsite agency. This authority may not be delegated.
3. Classify emergency events. Escalate, de-escalate, terminate emergency classification. This responsibility may not be delegated.
4. Approve all information released via the emergency notification form. Approval (signature) of contents of message form may not be delegated to others in the emergency organization.
5. Coordination with federal, state and local government agencies.
6. Provide approval of news releases if Public Spokesperson is unavailable.

**FIGURE B-8a**  
**OCONEE NUCLEAR STATION**  
**MINIMUM ON-SHIFT STAFFING LEVELS**

Functional Area	Major Tasks	Emergency Positions	Shift Staffing
1. Plant Operations and Assessment of Operational Aspects (a)	--	CR Supervisor (SRO) Control Room Operator (RO) Non-Licensed Operator (NLO)	3 6 3
2. Emergency Direction and Control	Command and Control	Ops Shift Manager	1
3. Notification & Communication	Licensee	Operator (SRO/RO/NLO)	1 <sup>(b)</sup>
	Local/ State	SRO	1
	Federal	Operator (SRO/RO/NLO)	1 <sup>(b)</sup>
4. Radiological Assessment	Dose Assessment	RP Qualified Individual	1
	In-plant Surveys	RP Qualified Individual	1
	Onsite Surveys	RP Qualified Individual	1
	Chemistry	Chemistry Technician	1
5. Plant System Engineering, Repair, and Corrective Actions	Tech Support – OPs – Core Damage	Shift Technical Advisor	1
		Shift Technical Advisor	1 <sup>(b)</sup>
	Repair and Corrective Actions	Mechanical Maintenance IAE Maintenance	2 2
6. In-Plant PAs	Radiation Protection (such as access control, job coverage and personnel monitoring)	RP Qualified Individual	2 <sup>(b)</sup>
7. Fire Fighting (c)	--	Fire Brigade Lead (SRO/NLO) Fire Brigade Member (NLO) Fire Brigade Member	1 4 5 <sup>(b,c)</sup>
8. 1 <sup>st</sup> Aid and Rescue	--	MERT (d)	2
9. Site Access Control and Accountability	Security & Accountability	SAS Operator Security Personnel	1 (e)
<b>Minimum # of Personnel:</b>			<b>31</b>

(a) The Control Room staff complement is reflective of 3 Units in operation.

(b) May be performed by an individual filling another position provided they are qualified to do the collateral function.

(c) The Fire Brigade requirement of ten members is met by using five personnel from Operations (including the Fire Brigade Leader) and five personnel from either SPOC, Radiation Protection, Chemistry or Security (SLC 16.13.1).

(d) The Medical Emergency Response Team (MERT) can be filled by any qualified technician.

(e) Per Duke Energy ONS Security Plan.

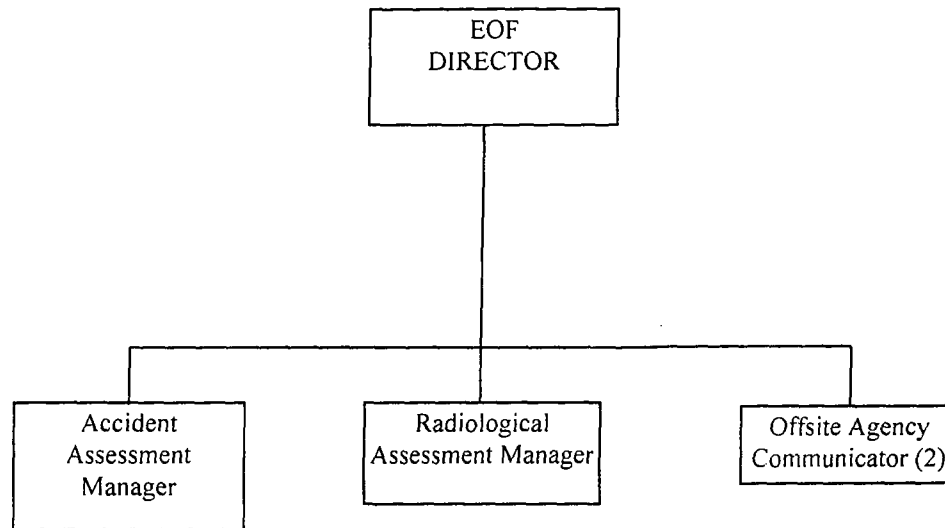
**FIGURE B-8b**  
**OCONEE NUCLEAR STATION**  
**MINIMUM AUGMENTED ERO STAFFING LEVELS**

MAJOR FUNCTIONAL AREA	MAJOR TASKS	POSITION TITLE OR EXPERTISE	CAPABILITY FOR ADDITIONS*	
			WITHIN 45 MINUTES	WITHIN 75 MINUTES
Emergency Director and Control (Emergency Coordinator) ***		Station Manager	—	1
Notification/Communication	Notify Company Personnel, State, County, Federal Agencies and maintain communication	State Communicators		2
EOF/Radiological Accident Assessment and Offsite Agency Support	EOF Director (Emergency Classification, Protective Action Recommendation, Offsite Agency Interface, ENF approval)	DPC Senior Manager	—	1
Emergency Classification	EOF Plant Assessment	Accident Assessment Manager	—	1
Dose Assessment and Protective Action Recommendations	EOF Offsite Dose Assessment/Protective Action Recommendations	Radiological Assessment Manager	—	1
Offsite Notifications	Offsite Agency Notifications	Offsite Agency Communicator	—	1
			—	1
	EOF Access Control	Electronic Card Reader	—	#
	TSC Dose Assessment/Protective Action Recommendations	Radiological Assessment	—	1
	Offsite Surveys	Field Monitoring Teams (2)		4 ****
	Onsite Surveys (Out-of-Plant)		1	1
	In-Plant Surveys		1	1
Plant System Engineering, Repair and Corrective Actions	Technical Support	Chemistry/Radio Chemistry		1
		Core/Thermal Hydraulics	—	1
		Electrical	—	1
	Repair and Corrective Actions	Mechanical	—	1
		Mechanical Maintenance	—	1
		Rad/Waste Operator	—	1
Protective Actions (In-Plant)	Radiation Protection A. Access Control B. RP Coverage for Repair Corrective Actions, Search and Rescue, First Aid & Firefighting C. Personnel Monitoring D. Dosimetry E. On-Shift Dose Assessment	I&E Technician	—	2
		RP Qualified Individuals	—	4
Firefighting	—	Fire Brigade		Local Support
Rescue Operations & First-Aid	—	MERT Team		Local Support

**FIGURE B-8b**  
**OCONEE NUCLEAR STATION**  
**MINIMUM STAFFING LEVELS**

- \* Consideration is given to the fact that many of the Oconee Nuclear Site Emergency Response Organization personnel do not live within a radius of the station which will allow a response time of 30 minutes or less under ideal conditions. Factors such as weather conditions, road capacity and traffic density, and the distance to travel from residence to the emergency response facility, indicate a realistic response time from a few minutes to 1 hour and 15 minutes for most employees. Consideration is also given to personnel on shift who are qualified and sufficient in number to handle any emergency condition until response personnel begin to arrive on site.
  
- \*\*\* Management of the Offsite Emergency Response will be assumed by the EOF Director when the Emergency Operations Facility is activated.  
  
Management of the Onsite Emergency Response is assumed by the Station Manager/alternate acting as the Emergency Coordinator when the Technical Support Center and Operational Support Centers are activated.
  
- \*\*\*\* The Field Monitoring Teams will initially report to the Body Burden Analysis (BBA) Room. If needed, the Field Monitoring Teams will dispatch from the Body Burden Analysis (BBA) Room. Once the Emergency Operations Facility (EOF) Field Monitoring Coordinator is ready he/she will assume control of the Field Monitoring Teams. A FMT consists of one RP qualified individual and one vehicle driver.
  
- # An electronic card reader in conjunction with a posted building security officer fulfills the function for controlling access to the EOF during emergencies.

**FIGURE B-9**  
**OCONEE NUCLEAR STATION**  
**MINIMUM STAFFING REQUIREMENTS**



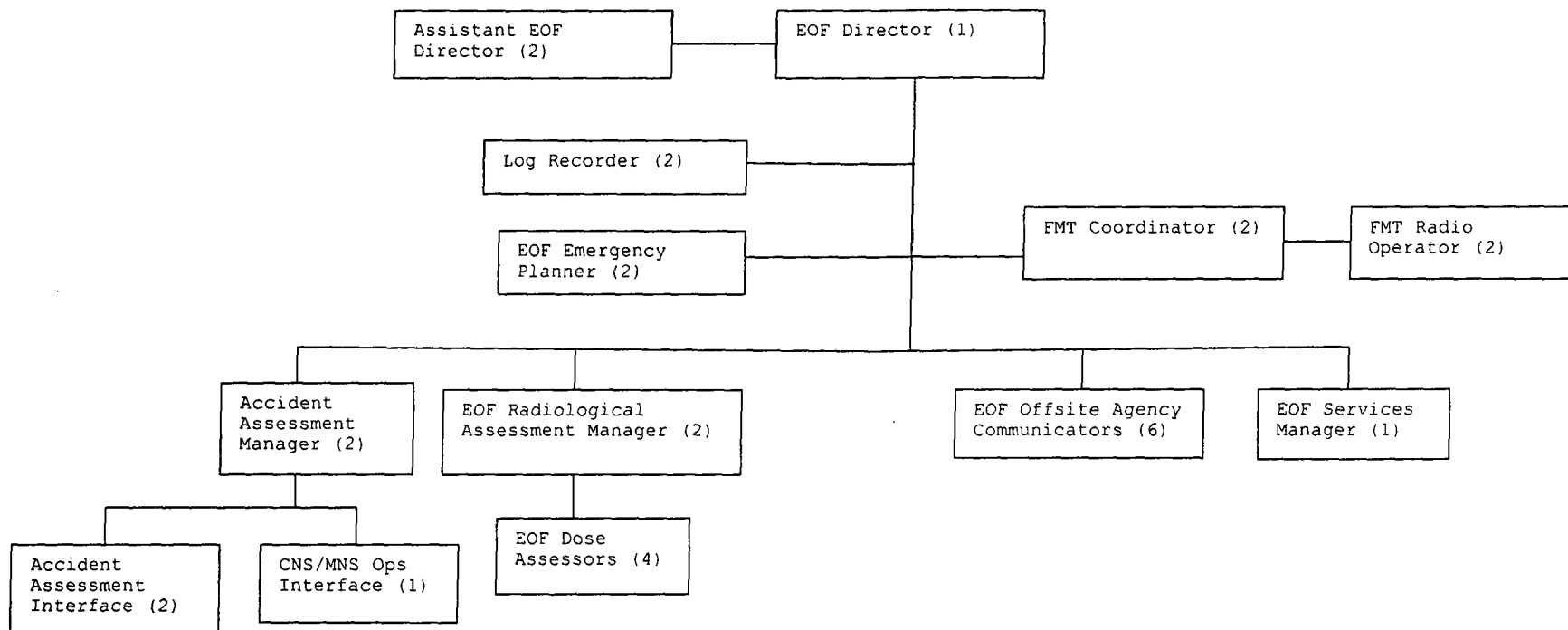
**FIGURE B-10**  
**OCONEE NUCLEAR STATION**  
**ONSITE EMERGENCY RESPONSE DUTIES**

RADIATION PROTECTION	CHEMISTRY	MAINTENANCE	OPERATIONS	WORK CONTROL	BUSINESS GROUP
Onsite Monitoring	Post-accident liquid sampling	Repair/calibration of electrical and mechanical equipment	Plant Operations	OSC Coordination	Provide personnel for field monitoring teams
Initial dose assessment	Chemistry analysis	Staff OSC with onshift personnel	Accident assessment	Recovery implementation	
Decontamination	Tank farm operation	Augment OSC with additional personnel	Safe shut-down of reactor	Provide personnel for field monitoring teams	
Post-accident gaseous sampling	Radwaste operation		Liaison with OSC		
Dose Control			Fire brigade response		
Provide personnel for field monitoring teams			Initial Emergency Management		
Evacuation coordination			NRC Communications		
RP support for work tasks in the field			Fire Support		

**FIGURE B-10**  
**OCONEE NUCLEAR STATION**  
**ONSITE EMERGENCY RESPONSE DUTIES**

<b>SAFETY ASSURANCE</b>	<b>ENGINEERING</b>	<b>SECURITY</b>	<b>SAFETY</b>	<b>NUCLEAR SUPPLY CHAIN SITE SERVICES GROUP</b>
	TSC LOG	ACCESS & CONTROL		COMMUNICATIONS EQUIPMENT
OFF SITE COMMUNICATIONS	TSC/OSC LIAISON TECHNICAL ASSISTANT	EVACUATION COORDINATION		SUPPLY/PARTS
ASSIST WITH ACCOUNTABILITY REPORTING	ENGINEERING SUPPORT	MEDICAL (MERT)	PERSONNEL SAFETY	HEAVY EQUIPMENT OPERATORS
ASSIST WITH EVACUATION	LIAISON WITH CORPORATE ACCIDENT ASSESSMENT GROUP			COMMISSARY
EMERGENCY PLANNING	TSC STATUS BOARDS			

**FIGURE B-11**  
**OCONEE NUCLEAR STATION**  
**Common EOF - Multi-Site Event Staffing**



1. Pagers activated for second unit - all call response
2. Assistant EOF Director assumes responsibility as lead manager for designated Site
3. Additional Log Keeper retained to support 2<sup>nd</sup> Site
4. Additional Accident Assessment Manager retained to support 2<sup>nd</sup> Site
5. Additional Dose Assessor retained to support 2<sup>nd</sup> Site
6. Additional FMT Coordinator retained to support 2<sup>nd</sup> Site
7. Additional FMT Radio Operator retained to support 2<sup>nd</sup> Site
8. Four additional Offsite Communicators as needed to support both Sites
9. Additional Emergency Planner as needed to support 2<sup>nd</sup> Site
10. Additional Radiological Assessment Manager as needed to support 2<sup>nd</sup> Site
11. Additional Assistant EOF Director as needed to support 2<sup>nd</sup> Site
12. Oconee Ops Interface position is staffed in the ONS TSC
13. Additional Accident Assessment Interface as needed to support 2<sup>nd</sup> Site



**§50.54(q) Screening Evaluation Form**

**Activity Description and References:** See Attached mark-up of Oconee Nuclear Station, Emergency Plan, Section B - Site Emergency Organization

**BLOCK 1**

The following changes are to be evaluated from Oconee Nuclear Station, Emergency Plan, Section B - Site Emergency Organization:  
(Screening 1 of 2 - Conforming Changes)

1. Section B.5: Added paragraph for the required detailed analysis of on-shift staffing fulfilled in the Oconee Nuclear Station (ONS) Emergency Response Organization (ERO) On-shift Staffing Analysis Report, Revision 0.
2. Figure B-8a: Added Figure B-8a that corresponds to Section 2.2 of the ONS ERO On-shift Staffing Analysis Report, Revision 0.
3. Figure B-8a: Title created for Figure B-8a for "MINIMUM ON-SHIFT STAFFING LEVELS."
4. Figure B-8b: Added "AUGMENTED ERO" to title to differentiate from Figure B-8a.
5. Figure B-8b: Deleted the second paragraph under "\*\*," as this information is now explicitly stated in Figure B-8a.
6. Figure B-8b: Deleted "\*\*\*" and the associated description, as this information is now contained in Figure B-8a.

**Discussion:**

10 CFR 50 Appendix E.IV specifies the requirements for the content of emergency plans. Subsection A.9 states the following:

*By December 24, 2012, for nuclear power reactor licensees, a detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan.*

As part of the overall Emergency Preparedness rulemaking published in November of 2011, the Commission amended §50, Appendix E, Section IV.A, Organization, to address concerns regarding the assignment of tasks or responsibilities to on-shift emergency response organization (ERO) personnel that would potentially overburden them and prevent the timely performance of their emergency plan functions.

In conjunction with the new rule, the NRC issued Interim Staff Guidance (ISG) NSIR/DPR-ISG-01. ISG Section IV.C provides specific detail on the criteria and acceptable methods for the conduct of the staffing analysis and includes the endorsement of NEI 10-05. The Oconee Nuclear Station (ONS) on-shift staffing analysis was performed in accordance with NEI 10-05.

The ISG considers the staffing analysis to be the technical basis for the on-shift ERO and also requires that it be part of emergency plan. The ISG specifies that §50.54(q) is the process by which staffing analyses are to be incorporated into licensee emergency plans. §50.54(q) uses the characteristic "reduction in effectiveness" to exclude those changes that would not reduce the effectiveness from the requirement to seek prior NRC approval, and therefore maintain the NRC staff's reasonable assurance determination, of the "original" approved emergency plan.

Adding the staffing analysis to the emergency plan per the new requirement of §50, Appendix E, Section IV.A.9 does not, by itself, reduce the effectiveness of the emergency plan, and as such does not require prior NRC approval. Regulatory Guide 1.219 requires consideration of "the basis for the staff's

## 3.10 10CFR 50.54(q) Evaluations

approval of the original plan" when performing a §50.54(q) evaluation for changes being made to the emergency plan. Since the on-shift ERO is part of the emergency plan, there is a licensing basis for that specific staffing level. At ONS, there was no prior on-shift staffing analysis mentioned in the emergency plan. Adding the staffing analysis to the ONS emergency plan, as the technical bases for that shift staffing, does not change the licensing basis because the report simply documents the methods and process used to formally establish the adequacy of the NRC approved on-shift staffing complement.

The results of the ONS analysis validate the adequacy of the current on-shift staffing ERO licensing basis and conclude that the emergency plan fulfills the §50.47(b)(2) planning standard requirement to have an adequate on-shift staffing level. As such, the inclusion of the staffing analysis as part of the ONS emergency plan does not result in a reduction in effectiveness and can be performed without prior NRC approval.

## References consulted:

- Oconee Emergency Plan Revision 12-3, Section N
- Federal Register Notice (76FR 72560), "Enhancements to Emergency Preparedness Regulations", November 23, 2011 [RIN 3150-AI10]
- Interim Staff Guidance, Rev. 0 (November 2011). NSIR/DPR-ISG-01
- NEI 10-05 [Revision 0], "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," June 2011.

PIP Corrective Actions addressed through Emergency Plan revision:

- G-12-0205 CA#5

## Activity Scope:

BLOCK 2

- ☒ The activity is a *change* to the *emergency plan*
- ☐ The activity is not a *change* to the *emergency plan*

## Change Type:

BLOCK 3

- ☐ The change is editorial or typographical
- ☒ The change is not editorial or typographical

## Change Type:

BLOCK 4

- ☒ The change does conform to an activity that has prior approval
- ☐ The change does not conform to an activity that has prior approval

<b>Planning Standard Impact Determination:</b>		<b>BLOCK 5</b>
<input type="checkbox"/> §50.47(b)(1) – Assignment of Responsibility (Organization Control) <input type="checkbox"/> §50.47(b)(2) – Onsite Emergency Organization <input type="checkbox"/> §50.47(b)(3) – Emergency Response Support and Resources <input type="checkbox"/> §50.47(b)(4) – Emergency Classification System* <input type="checkbox"/> §50.47(b)(5) – Notification Methods and Procedures* <input type="checkbox"/> §50.47(b)(6) – Emergency Communications <input type="checkbox"/> §50.47(b)(7) – Public Education and Information <input type="checkbox"/> §50.47(b)(8) – Emergency Facility and Equipment <input type="checkbox"/> §50.47(b)(9) – Accident Assessment* <input type="checkbox"/> §50.47(b)(10) – Protective Response* <input type="checkbox"/> §50.47(b)(11) – Radiological Exposure Control <input type="checkbox"/> §50.47(b)(12) – Medical and Public Health Support <input type="checkbox"/> §50.47(b)(13) – Recovery Planning and Post-accident Operations <input type="checkbox"/> §50.47(b)(14) – Drills and Exercises <input type="checkbox"/> §50.47(b)(15) – Emergency Responder Training <input type="checkbox"/> §50.47(b)(16) – Emergency Plan Maintenance <b>*Risk Significant Planning Standards</b>  <input type="checkbox"/> The proposed activity does not impact a Planning Standard		
<b>*Per the procedure Block 5 is skipped. ~DMB, 11.20.12*</b>		
<b>Commitment Impact Determination:</b>		<b>BLOCK 6</b>
<input type="checkbox"/> The activity <u>does</u> involve a site specific EP commitment Record the commitment or commitment reference: _____  <input type="checkbox"/> The activity <u>does not</u> involve a site specific EP commitment		
<b>*Per the procedure Block 6 is skipped. ~DMB, 11.20.12*</b>		
<b>Screening Evaluation Results:</b>		<b>BLOCK 7</b>
<input checked="" type="checkbox"/> The activity <u>can</u> be implemented without performing a §50.54(q) effectiveness evaluation <input type="checkbox"/> The activity <u>cannot</u> be implemented without performing a §50.54(q) effectiveness evaluation		
Preparer Name: Douglas M. Brunson	Preparer Signature <i>Douglas M Brunson</i>	Date: November 20, 2012
Reviewer Name: <i>RAY WATERMAN</i>	Reviewer Signature <i>Ray Waterman</i>	Date: <i>12-6-12</i>

**§50.54(q) Screening Evaluation Form**

**Activity Description and References:** See Attached mark-up of Oconee Nuclear Station, Emergency Plan, Section B - Site Emergency Organization

**BLOCK 1**

The following changes are to be evaluated from Oconee Nuclear Station, Emergency Plan, Section B - Site Emergency Organization:  
(Screening 2 of 2 - Editorial Changes)

1. Section B.5: Revised Figure B-8 references as appropriate to differentiate between Figure B-8a and Figure B-8b.
2. Section B.9: Added a "-" behind "MEDICAL" to maintain internal consistency.
3. Figure B-1: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
4. Figure B-4A: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
5. Figure B-4C: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
6. Figure B-5: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
7. Figure B-6: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
8. Figure B-8: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
9. Figure B-8b: Renamed original Figure B-8 to Figure B-8b.
10. Figure B-8b: Relocated "Plant Operations and Assessment of Operational Aspects" to Figure B-8a.
11. Figure B-8b: Relocated "Operations Shift Manager" to Figure B-8a.
12. Figure B-8b: Relocated "Control Room Senior Reactor Operator (SRO)" equivalent to Figure B-8a.
13. Figure B-8b: Relocated "Control Room Reactor Operators (RO)" equivalent to Figure B-8a.
14. Figure B-8b: Relocated "Nuclear Equipment Operators" equivalent to Figure B-8a.
15. Figure B-8b: Relocated "Operations Designee" equivalent for communications to Figure B-8a.
16. Figure B-8b: Relocated "Shift Technical Advisor (STA)" to Figure B-8a.
17. Figure B-8b: Relocated "Site Access Control and Personnel Accountability" to Figure B-8a.
18. Figure B-8b: Relocated "Security, Firefighting Communications, Personnel Accountability" equivalent to Figure B-8a.
19. Figure B-8b: Relocated "Security Personnel" to Figure B-8a.
20. Figure B-8b: Reformatted Figure B-8b by removing empty rows/columns due to relocated information to Figure B-8a.
21. Figure B-9: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
22. Figure B-10: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
23. Figure B-11: Removed "DUKE ENERGY COMPANY" from title to maintain consistency.
24. Footer: Renamed to Rev. 12-04, December 2012 as to accurately reflect the current ONS Emergency Plan Revision.
25. Various editorial changes to the document for internal consistency. (ex. Font size, Bold/Not Bold, Tabs, Underline, etc)

**Discussion:**

These changes are considered to be editorial because they are

- Reference or annotation changes,
- Procedure title changes,
- Grammar, and
- Formatting changes that do not change intent, purpose, or order of procedural steps and do not change the intent or value of a program element and do not impact the capability or timeliness of the Emergency Notification Function and will not be evaluated further:

**References consulted:**

- Oconee Emergency Plan Revision 12-2, Section N

3.10 10CFR 50.54(q) Evaluations

- Federal Register Notice (76FR 72560), "Enhancements to Emergency Preparedness Regulations", November 23, 2011 [RIN 3150-A110]
- Interim Staff Guidance, Rev. 0 (November 2011). NSIR/DPR-ISG-01
- NEI 10-05 [Revision 0], "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," June 2011.

Emergency Plan revision addressed the following PIP Corrective Actions:

- G-12-0205 CA#5

Activity Scope:

**BLOCK 2**

- ☒ The activity is a change to the emergency plan
- ☐ The activity is not a change to the emergency plan

Change Type:

**BLOCK 3**

- ☒ The change is editorial or typographical
- ☐ The change is not editorial or typographical

Change Type:

**BLOCK 4**

- ☐ The change does conform to an activity that has prior approval
- ☐ The change does not conform to an activity that has prior approval

**\*Per the procedure Block 4 is skipped.  
~DMB, 11.20.12\***

Planning Standard Impact Determination:

**BLOCK 5**

- ☐ §50.47(b)(1) – Assignment of Responsibility (Organization Control)
- ☐ §50.47(b)(2) – Onsite Emergency Organization
- ☐ §50.47(b)(3) – Emergency Response Support and Resources
- ☐ §50.47(b)(4) – **Emergency Classification System\***
- ☐ §50.47(b)(5) – **Notification Methods and Procedures\***
- ☐ §50.47(b)(6) – Emergency Communications
- ☐ §50.47(b)(7) – Public Education and Information
- ☐ §50.47(b)(8) – Emergency Facility and Equipment
- ☐ §50.47(b)(9) – **Accident Assessment\***
- ☐ §50.47(b)(10) – **Protective Response\***
- ☐ §50.47(b)(11) – Radiological Exposure Control
- ☐ §50.47(b)(12) – Medical and Public Health Support
- ☐ §50.47(b)(13) – Recovery Planning and Post-accident Operations
- ☐ §50.47(b)(14) – Drills and Exercises
- ☐ §50.47(b)(15) – Emergency Responder Training
- ☐ §50.47(b)(16) – Emergency Plan Maintenance

**\*Risk Significant Planning Standards**

- ☐ The proposed activity does not impact a Planning Standard

**\*Per the procedure Block 5 is skipped. ~DMB, 11.20.12\***

Commitment Impact Determination:

**BLOCK 6**

- ☐ The activity does involve a site specific EP commitment
- Record the commitment or commitment reference: \_\_\_\_\_
- ☐ The activity does not involve a site specific EP commitment

**\*Per the procedure Block 6 is skipped. ~DMB, 11.20.12\***

3.10 10CFR 50.54(q) Evaluations

<b>Screening Evaluation Results:</b>		<b>BLOCK 7</b>
<input checked="" type="checkbox"/> The activity <u>can</u> be implemented without performing a §50.54(q) effectiveness evaluation		
<input type="checkbox"/> The activity <u>cannot</u> be implemented without performing a §50.54(q) effectiveness evaluation		
Preparer Name: Douglas M. Brunson	Preparer Signature <i>Douglas M Brunson</i>	Date: November 20, 2012
Reviewer Name: <i>Ray Waterman</i>	Reviewer Signature <i>Ray Waterman</i>	Date: <i>12-6-12</i>