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 AUTH. NAME: AUTHOR AFFILIATION
 UTLEY, E. E. Carolina Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 EISENHUT, D. G. Division of Licensing

SUBJECT: Forwards proposal for emergency response facilities per
 810609 commitments consisting of const of new emergency
 operations facilities, continued utilization of technical
 support ctr & provision of small backup facilities.

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Carolina Power & Light Company

November 4, 1981

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Mr. Darrell G. Eisenhut, Director
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D.C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
EMERGENCY RESPONSE FACILITIES



Dear Mr. Eisenhut:

Summary

In its letters of June 9, 1981, Carolina Power & Light Company (CP&L) committed to forward the results of its evaluation of various concepts for Emergency Response Facilities. That evaluation is now complete and the concept that CP&L believes to be the most viable is described in the attached proposal.

In brief, the proposal consists of constructing new Emergency Operations Facilities (EOFs) between 10 to 20 miles from each plant, continued utilization of the Technical Support Center (TSCs) previously constructed by CP&L at each site, and provision of small backup facilities adjacent to the plant Control Rooms as a backup location for key management personnel in the unlikely event that the TSCs would have to be evacuated. All other TSC personnel would be relocated at the EOF.

Background

CP&L firmly believes that the workability of the above concept has been demonstrated by the emergency exercises conducted at H. B. Robinson and Brunswick this year and that this concept provides the most cost efficient method of achieving the goals and philosophy of current emergency preparedness criteria. CP&L requests that NRC conduct an expeditious review of this proposal and provide early feedback to CP&L

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on its acceptability. CP&L is not prepared to proceed on this course of action without first receiving written concurrence from the NRC. It is suggested that after your initial review, a management level meeting be arranged between CP&L and NRC to discuss this concept and to answer any questions which you may have. CP&L will seek to arrange such a meeting in the near future through the cognizant NRC Project Managers.

If you have any questions on the above items, please contact our staff.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

JJS/lr (4355)

cc: B. Grimes (NRC)
W. Ross (NRC)
J. Van Vliet (NRC)

PROPOSAL FOR EMERGENCY RESPONSE FACILITIES

I. Introduction

The following is a description of proposed Emergency Response Facilities for the Brunswick and Robinson Steam Electric Plants. These facilities include the Technical Support Center (TSC) and the Emergency Operations Facility (EOF) at each plant as required by the NRC in 10CFR50, Appendix E. These facilities provide enhanced emergency response capabilities and their functions are described in the Plant Emergency Plans. Described below is an overview of the concept and a general description of each facility.

II. Overview of the Concept

CP&L will maintain the present TSCs at each plant and construct new near-site EOFs. We will provide a backup capability for key management personnel in a small facility located adjacent to the Control Rooms, in the event the TSC must be evacuated. The remainder of the TSC personnel would be evacuated to the near-site EOF. The near-site EOF will be designed and located to meet the requirements of NUREG-0696, "Functional Criteria for Emergency Response Facilities". No backup for the EOF is required due to its location, i.e., between 10 and 20 miles of the TSC.

III. General Description

A. Emergency Operations Facility

The EOF provides a location for individuals to manage the overall emergency response, coordinate radiological and environmental assessment, determine recommended public pro-

tective actions, and coordinate emergency response activities with Federal, State, and local agencies. Sufficient space will be provided for approximately 350 media representatives to be briefed by CP&L, State, and NRC personnel.

The EOF facilities presently on site at each plant, will be relocated to a new structure between 10 and 20 miles from the plant and will be constructed to meet the requirements of NUREG-0696. In addition, sufficient space and facilities will be provided to accomodate appropriate TSC personnel in the unlikely event that the TSC must be evacuated.

B. Technical Support Center (TSC)

The TSC provides a location to house individuals who are knowledgeable of and responsible for engineering and management support of plant operations during an emergency. The TSC is the focal point where management and technical personnel support reactor control functions, evaluate and diagnose plant conditions, and conduct necessary emergency response operations. Staffing for the TSCs is described in the Plant Emergency Plans and Procedures.

The present TSC at each plant is a pre-engineered metal building situated on a concrete slab. The TSC at Brunswick is located in the Document Control Building outside the protected area security fence. The TSC at Robinson is located in the Administration and TSC Building inside the fenced security area but outside the protected area security fence. The TSCs were built in accordance with the local building codes. Radiation exposure to the TSC personnel has been previously examined. NUREG-0696 requires that TSCs be designed to habitability requirements necessary to protect TSC personnel from radiological hazards, including direct radiation from the containment and airborne radioactivity. To insure this degree of habitability, the TSC ventilation system will be modified to include high-efficiency particulate air (HEPA) and

charcoal filters. Additional evaluation is being performed to determine if any modifications are needed to reduce the effects of direct radiation from the Containment or passing radioactive clouds.

The present TSCs at both plants have been utilized during full scale emergency exercises and functioned in an adequate manner. In the unlikely event the TSC must be evacuated, key management personnel will be relocated to the backup facility adjacent to the Control Room. These personnel include the Site Emergency Coordinator (SEC), his principal directors, a log keeper, and a phone talker (nominally seven individuals). The remainder of the TSC Staff (20-30 individuals) will be evacuated to the near-site EOF. The backup facilities will be within the same environmental envelope as the Control Room and are therefore just as habitable. The backup facility at the Brunswick Plant will be located in the Visitor Gallery adjacent to the Control Room. The backup facility at the Robinson Plant will be located in the section of the Control Room which previously contained the Unit 1 Control Board. These backup facilities will contain access to adequate communications and data readouts located in the Control Room to allow the SEC and his directors to continue to perform their functions and to communicate effectively with their staffs, who will reestablish themselves in the EOF.

IV. Conclusions

In conclusion, we believe this is a workable concept for both the Brunswick and Robinson plants. It is consistent with experience gained from CP&L's Emergency Drills at both plants. This system of Emergency Response Facilities meets the requirements of 10CFR50, Appendix E, and the philosophy of NUREG-0696 and NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants".