



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

September 8, 2014

Mr. Scott Batson
Vice President
Oconee Nuclear Station
Duke Energy Corporation
7800 Rochester Highway
Seneca, SC 29672

SUBJECT: OCONEE NUCLEAR STATION – U.S. NUCLEAR REGULATORY COMMISSION
EMERGENCY PREPAREDNESS INSPECTION REPORT 05000269/2014502,
05000270/2014502, AND 05000287/2014502

Dear Mr. Batson:

On August 21, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Oconee Nuclear Station. The enclosed inspection report documents the inspection results that were discussed on August 21, 2014, with you and members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations, and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings were identified.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter, its Enclosure, and your response, if any, will be available electronically for public inspection in the NRC Public Document Room, or from the Publicly Available Records (PARS) component of NRC's Documents Access and Management

System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Brian Bonser, Chief
Plant Support Branch 1
Division of Reactor Safety

Docket Nos. 50-269, 50-270, and 50-287
License Nos. DPR-38, DPR-47, and DPR-55

Enclosure:
IR 05000269, 270, and 287/2014502
w/Attachment: Supplementary Information

cc: Distribution via Listserv

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ADAMS: ☒ Yes

ACCESSION NUMBER: ML14252A038

☒ SUNSI REVIEW COMPLETE

☒ FORM 665 ATTACHED

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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos: 05000269, 05000270, and 05000287

License Nos: DPR-38, DPR-47, and DPR-55

Report Nos: 05000269/2014502, 05000270/2014502, and 05000287/2014502

Licensee: Duke Energy Corporation

Facility: Oconee Nuclear Station, Units 1, 2, and 3

Location: Seneca, SC

Dates: August 18 – 21, 2014

Inspectors: M. Speck, Senior Emergency Preparedness Inspector
S. Sanchez, Sr. Emergency Preparedness Inspector
C. Fontana, Emergency Preparedness Inspector
J. Shehee, Sr. Physical Security Specialist
W. Loo, Sr. Health Physicist
B. Cecere, Emergency Preparedness Specialist

Approved by: Brian Bonser, Chief
Plant Support Branch 1
Division of Reactor Safety

Enclosure

SUMMARY

Inspection Report (IR) 05000269/2014502; 05000270/2014502; 05000287/2014502;
08/18-2014 – 08/21//2014; Oconee Nuclear Station, Unit 1, 2 and 3; Baseline Inspection

The report covered an announced inspection by three emergency preparedness inspectors, one emergency preparedness specialist, one senior physical security inspector, and one senior health physicist. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

Since the last NRC inspection of this program area, Revision 2014-01 was made to the Oconee Radiological Emergency Plan (REP). The licensee implemented several changes to emergency plan implementing procedures and determined that, in accordance with 10 CFR 50.54(q), the changes made in these revisions resulted in no reduction in the effectiveness of the Plan, and that the Plan continued to meet the requirements of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. The inspectors reviewed a sampling of the implementing procedure changes made between September 2013 and July 2014, to evaluate for potential reductions in the effectiveness of the Plan. However, this review was not documented in a Safety Evaluation Report (SER) and does not constitute formal NRC approval of the changes. Therefore, these changes remain subject to future NRC inspection in their entirety.

The inspection was conducted in accordance with NRC Inspection Procedure (IP) 71114, Attachment 04, Emergency Action Level and Emergency Plan Changes. The applicable planning standards of 10 CFR 50.47(b), and its related requirements in 10 CFR 50, Appendix E, were used as reference criteria.

The inspectors reviewed various documents that are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the emergency action level (EAL) and emergency plan changes on an annual basis.

b. Findings

No findings were identified.

1EP7 Exercise Evaluation – Hostile Action Event

a. Inspection Scope

Title 10 CFR 50, Appendix E, Section IV.F.2.j, requires in part that nuclear power reactor licensees, in each 8-calendar-year exercise cycle, provide the opportunity for their emergency response organization (ERO) to demonstrate proficiency in the key skills necessary to respond to a hostile action (HA) directed at the plant site. The licensee designed the August 19, 2014, exercise to satisfy that requirement, and the NRC inspected the HA event exercise to assess the licensee's ability to effectively implement their emergency plan during a HA event, and adequately protect public health and safety.

The exercise evaluation consisted of the following reviews and assessments:

- The adequacy of the licensee's performance in the biennial exercise, conducted on August 19, 2014, was reviewed and assessed regarding the implementation of the Risk Significant Planning Standards (RSPS) in 10 CFR 50.47 (b)(4), (5), (9), and (10) which address emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities," and Emergency Plan commitments. The facilities assessed were the Control Room Simulator, Joint Information Center (JIC), simulated Central Alarm and Secondary Alarm Stations, Incident Command Post (ICP), the Technical Support Center, the Operations Support Center and the Emergency Operations Facility (EOF).
- A review of other performance areas, such as the ERO recognition of abnormal plant conditions; command and control, including interactions with site security staff, intra- and inter-facility communications; prioritization of mitigation activities; utilization of repair and field monitoring teams; interface with offsite agencies, including local law enforcement agencies; staffing and procedure adequacy; and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Federal Emergency Management Agency (FEMA)/Department of Homeland Security (DHS) exercise reports to determine the effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10 CFR 50.47(b)(14).
- The adequacy of the licensee's post-exercise critiques, to evaluate licensee self-assessment of its ERO performance during the August 19, 2014, exercise to ensure compliance with 10 CFR 50, Appendix E, Subsection IV.F.2.g.

The inspectors reviewed various documents which are listed in the Attachment. This inspection activity satisfied one inspection sample for the exercise evaluation on a biennial basis.

b. Findings

No findings were identified.

1EP8 Exercise Evaluation – Scenario Review

a. Inspection Scope

Prior to the inspection activity, the inspectors conducted an in-office review of the exercise objectives and scenario submitted to the NRC using IP 71114.08, "Exercise Evaluation - Scenario Review," to determine if the exercise would test major elements of the emergency plan as required by 10 CFR 50.47(b)(14).

The inspectors reviewed various documents which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the exercise valuation on a biennial basis.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

a. Inspection Scope

The inspector sampled licensee submittals relative to the performance indicators (PIs) listed below for the period July 1, 2013, through June 30, 2014, to verify the accuracy of the PI data reported during that period, PI definitions, and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7 was used to confirm the reporting basis for each data element.

Emergency Preparedness Cornerstone

- Emergency Response Organization Drill/Exercise Performance (DEP)
- Emergency Response Organization Readiness (ERO)
- Alert and Notification System Reliability (ANS)

For the specified review period, the inspector examined data reported to the NRC, procedural guidance for reporting PI information, and records used by the licensee to identify potential PI occurrences. The inspector verified the accuracy of the DEP through review of a sample of drill and event records. The inspector reviewed selected training records to verify the accuracy of the ERO PI for personnel assigned to key positions in the ERO. The inspector verified the accuracy of the PI for ANS reliability through review of a sample of the licensee's records of periodic system tests. Licensee procedures, records, and other documents reviewed within this inspection area are listed in the Attachment.

The inspector reviewed various documents which are listed in the Attachment. This inspection activity satisfied one inspection sample for each of the three emergency preparedness PIs (i.e., DEP, ERO, and ANS) on an annual basis.

b. Findings

No findings were identified.

4OA6 Meetings, Including Exit

On August 21, 2014, the lead inspector presented the inspection results to Mr. S. Batson and other members of the plant staff. The inspectors confirmed that proprietary information provided during the inspection was returned or destroyed.

ATTACHMENT: SUPPLEMENTARY INFORMATION

SUPPLEMENTARY INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

M. Austin, Corporate Emergency Preparedness Functional Area Manager
S. Batson, Site Vice President
E. Burchfield, General Manager, Nuclear Engineering
D. Crowl, Emergency Preparedness staff
P. Fisk, Nuclear Operations Manager
R. Guy, Director, Site Support
N. Harness, Emergency Preparedness staff
B. Kimray, Fleet Emergency Preparedness staff
M. McNeely, Director Nuclear Plant Security
J. Overly, Fleet Emergency Preparedness staff
T. Patterson, Organizational Effectiveness Director
M. Nelson, Fleet Emergency Preparedness staff
T. Ray, Plant Manager
K. Robinson, Manager Nuclear Security Operations
J. Smith, Regulatory Affairs Specialist
P. Street, Emergency Preparedness Manager
M. Stephens, Emergency Preparedness staff
E. Tibbs, Lieutenant, Day Shift Training Team
E. White, Fleet Emergency Preparedness staff

ITEMS OPENED, CLOSED, DISCUSSED, AND UPDATED

None

LIST OF DOCUMENTS REVIEWED

1EP4 EAL and Emergency Plan Changes

Change Packages

Revision 2014-01 to ONS Emergency Plan Volume A, dated 4/3/14
Revision 2013-01 to ONS Emergency Plan Volume A, dated 10/15/13
Procedure Change Process Record to RP/0/A/1000/001, Emergency Classifications, Rev. 1, dated 4/24/14
EM 5.1, Engineering Emergency Response Plan Revision, dated 12/5/13
EPA Section B, E-Plan A – Section B Onsite Emergency Organization, Rev. 6
EPA Section D, E-Plan A – Section D Emergency Classification System, Rev. 6
EPA Section H, E-Plan A – Section H Emergency Facilities and Equipment, Rev. 4
EPA Section J, E-Plan A – Section J Protective Response, Rev. 4
EPA Section M, E-Plan A – Section M Recovery and Reentry Planning and Post Accident Operations, Rev. 2
EPA Section P, E-Plan A – Section P Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of the E-Plan, Rev. 5

EPA Appendix 2, E-Plan A – Appendix 2 Meteorology and Offsite Dose Assessment Program, Rev. 2

EPA Appendix 5, E-Plan A – Appendix 5 Agreement Letters, Rev. 7

Corrective Action Program documents

O-13-10138, 2013 NRC EP inspection identified issue

O-13-10338, Historical documentation was missing showing history of changes to the E-Plan

O-14-00670, 30-day requirement to transmit E-Plan procedures to the NRC not met

O-14-02054, Emergency Planning missed an opportunity to conduct a 50.54q screen evaluation

O-14-05893, A controlling procedure for RP/O/B/1000/027 was not available in NEDL

1EP7 Exercise Evaluation

Procedures

Oconee Emergency Plan A, Rev. 2014-01

AP/O/A/1700/045, Security Threats, Rev. 14

Duke Energy Physical Security Plan, Rev. 21

EPFAM Section 3.19, Drills and Exercises, Rev. 4

HP/O/B/10009/018, Off-Site Dose Projections, Rev. 23

HP/O/B/1009/018, Off-Site Dose Projections, Rev. 23

RP/O/A/1000/001, Emergency Classifications, Rev. 1

RP/O/B/1000/002, Control Room Emergency Coordinator Procedure, Rev. 5

RP/O/B/1000/015A, Offsite Communications from the Control Room, Rev. 2

RP/O/A/1000/019, Technical Support Center Emergency Coordinator Procedure, Rev. 6

RP/O/B/1000/024, Protective Action Recommendations, Rev. 008

SH/O/B/2005/001, Emergency Response Offsite Dose Projections, Rev. 6

SP/C/1602-0, Law Enforcement Response Plan, Rev. 8

SP/C/1629-0, Security Support of Site Emergency Response, Rev. 13

SP/C/1600-0, Security Event Response, Rev. 7

SP/O/1307-0, Security Response Strategy, Rev. 29

SR/O/A/2000/003, Activation of the Emergency Operations Facility, Rev. 2

Records and Data

Control Room, Technical Support Center, Operational Support Center, Emergency Operations Facility, Joint Information Center, Incident Command Post - Documentation packages (logs, event notification forms, Protective Action Recommendations, Media releases, and Radiological Dose Assessments)

2012, 2013, and 2014 Emergency Exercise and drill scenario documents

Corrective Action Program documents

O-14-8998, Personnel moving in OCA during duck-and-cover

O-14-9018, Some TSC procedures had pages missing

O-14-9023, 24-hour coverage not arranged at JIC

O-14-9026, JIC procedure updating

O-14-9027, Clarification for non-essential personnel during hostile action

O-14-9031, Unsat performance objective F.1 performance

O-14-9032, Objective B.02 not observed

O-14-9034, Incorrect SDS simulator data

O-14-9036, ERO pager activation delayed

O-14-9040, Spill response procedure needs clarification

O-14-9045, TSC/OSC/Simulator information sharing needs improvement
 O-14-9064, NRC requested information inaccessible
 O-14-9082, Clarify “release is occurring” definitions between facilities
 O-14-9101, Offsite radios need programming verified
 O-14-9103, Objective E.3 unsat due to inaccurate release data
 O-14-9137, Selective Signaling phone in Oconee County not ringing or lighting

Section 4OA1: Performance Indicator Verification

Procedures

EPFAM Section 3.3, Alert and Notification System (Siren Program), Rev. 11
 EPFAM Section 3.6, Alert and Notification System – Oconee Specific Supplement, Rev. 6
 EPFAM Section 3.7, NRC Regulatory Assessment Performance Indicator Guideline –
 Emergency Preparedness Cornerstone, Rev. 19

Records and Data

DEP opportunities documentation for 3rd, and 4th quarter 2013; and 1st and 2nd quarter 2014
 Siren test data for 3rd and 4th quarter 2013; and 1st and 2nd quarter 2014
 ERO training records for 3rd and 4th quarter 2013; and 1st and 2nd quarter 2014

Corrective Action Program Documents

O-13-14913, Classification timeliness
 O-13-15215, Declaration and Public Address announcement
 O-14-01508, Late classification during the drill
 O-14-01520, ERO alert, notify, and mobilize
 O-14-01652, DEP PI documentation
 O-14-01673, EAL repetition
 O-14-06658, DEP Data reporting
 O-14-06899, PAR development
 O-14-06657, Inaccurate PI data submitted for 4Q13 and 1Q14
 O-14-09073, DEP data error February 2014
 O-14-09074, DEP data error September 2013
 O-14-09075, DEP data error March 2014

LIST OF ACRONYMS USED

ANS	Alert and Notification System	HA	Hostile Action
DEP	Drill and Exercise Performance	ICP	Incident Command Post
DHS	Department of Homeland Security	IP	Inspection Procedure
EAL	Emergency Action Level	JIC	Joint Information Center
EOF	Emergency Operations Facility	NEI	Nuclear Energy Institute
ERF	Emergency Response Facility	PIs	Performance Indicators
ERO	Emergency Response Organization	REP	Radiological Emergency Plan
FEMA	Federal Emergency Management Agency	RSPS	Risk Significant Planning Standard
		SER	Safety Evaluation Report