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SESSION NBR: 9101110312 DOC. DATE: 91/01/07 NOTARIZED: NO DOCKET #  
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 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270  
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

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SUBJECT: Responds to exercise weaknesses identified in Insp Repts  
 50-269/90-26, 50-270/90-26 & 50-287/90-26. Corrective actions:  
 enhancements made in recall sys to improve efficiency &  
 effectiveness.

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**DUKE POWER**

January 7, 1991

US Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, 50-270, 50-287  
Inspection Report 90-26  
Annual Exercise

Gentlemen:

Two exercise weaknesses were identified as a result of NRC Inspection 90-26. Duke Power Company makes the following response:

**Exercise Weakness 50-269, 270, 287/90-26-01: Failure to staff and activate the TSC within 45 minutes as stated in the Oconee Emergency Plan.**

The Oconee Nuclear Station Emergency Plan, Table B-5, requires additional support to the Control Room within 45 minutes and 75 minutes. Dose assessment and offsite communications support were not available within the required 45 minutes. All other personnel were available. The Station Manager/alternate is required to be available to relieve the Shift Supervisor as Emergency Coordinator in the TSC within 75 minutes. The time for activation of the TSC was clocked at 75 minutes as required by the Emergency Plan.

The following actions have been taken to provide support to the control room within the stated times of the ONS Emergency Plan.

1. Enhancements have been made in our recall system to improve its efficiency and effectiveness.
2. Offsite pagers used for recall of emergency response personnel will be tested weekly.
3. Special arrangements for parking and personnel safety requirements have been made to expedite TSC personnel into the plant.

The following commitments are made to assure that the recall procedure continues to meet emergency plan time requirements.

1. Schedule TSC after hours activation drill for November and December, 1990 and January, 1991.
2. Schedule a TSC after hours activation drill each quarter in 1991. Test the TSC after hours activation process semi-annually each year thereafter.

**Exercise Weakness 50-269, 270, 287/90-26-02: Communication problems between the TSC and the State Forward Emergency Operations Center reduced the effectiveness of the State's ability to perform timely independent analysis and draw conclusions from scenario generated events.**

Many of the problems as stated in the inspection report were caused by the TSC taking the full 75 minutes to activate and the State of South Carolina being pre-staged in the Clemson Armory. Timely and direct communications between Oconee Nuclear Station and the offsite agencies is vital to their response.

A meeting was held November 13, 1990 in Columbia, South Carolina with the State of South Carolina Emergency Preparedness Agency, Bureau of Radiological Health and Duke Power corporate and station emergency preparedness personnel. The meeting was very productive.

The following actions have been taken:

1. Premarking of the notification message form has been reduced to a minimum. Protective action recommendations for SAE and GE will be reported on each subsequent message sheet, until the required action is changed.
2. Procedures have been revised to require the Station Manager/alternate to contact county and state emergency directors once the TSC has been activated to assure that plant status and/or protective actions are clearly understood.
3. RP/O/B/1000/15, Offsite Communicator, has been revised to provide specific information concerning the agencies who are required to receive FAX copies of message sheets.
4. Training has been given to the TSC Clerks concerning their duties and responsibilities for transmitting and verifying that copies of message forms were sent to offsite agencies. Logs noting date and time are now required for transmittal of message forms.

5. Dose Assessment personnel have received training and now have procedures in place concerning communication channels with state agencies.
6. Additional training has been provided to TSC offsite communicators concerning completion of the message form. Particular attention was given to identify the problems related to providing different times for the start of the release. The offsite communicators have the responsibility to check the notification form for accuracy.
7. A procedure has been developed to remove pre-recorded phone messages from specified phones within the TSC/OSC after the emergency facilities are activated.

I believe the actions that have been taken will serve to correct the identified weaknesses in the Oconee emergency planning program.

Very Truly Yours,



M. S. Tuckman

CCJ/39

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