



J. Ed Burchfield, Jr.
Vice President
Oconee Nuclear Station

Duke Energy
ON01VP | 7800 Rochester Hwy
Seneca, SC 29672

864.873.3478
864.873.4208
Ed.Burchfield@duke-energy.com

RA-20-0043

February 6, 2020

10 CFR 50.54(q)
10 CFR 72.44(f)

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, Maryland 20852-2746

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, -270, and -287
Emergency Plan Revision 2020-001

Pursuant to 10 CFR 50.54(q), and 10 CFR 72.44(f), Duke Energy is submitting the attached summary of changes to the Oconee Nuclear Station (ONS) Emergency Plan which became effective January 9, 2020.

This revision has been evaluated in accordance with 10 CFR 50.54(q) and it was determined that the change did not reduce the effectiveness of the ONS Emergency Plan. The revised ONS Emergency Plan continues to meet the requirements of Appendix E to 10 CFR 50 and the planning standards of 10 CFR 50.47(b).

If there are any questions or concerns pertaining to this revision please call Sheila Dalton, Manager Nuclear Support Services, at 864-873-3657.

Sincerely,

J. Ed Burchfield, Jr.
Vice President
Oconee Nuclear Station

Attachments

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P
EPLAN CHANGE SUMMARY 2020-001 - Appendices 2,3,4,5

RA-20-043

U. S. Nuclear Regulatory Commission
February 6, 2020
Page 2

xc: Ms. Laura Dudes
Administrator, USNRC Region II
Marquis One Tower
245 Peachtree Center., NE Suite 1200
Atlanta GA 30303-1257

Ms. Andrea Kock
Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Ms. Audrey Klett
Project Manager
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Mike Mahoney
Project Manager
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Jared Nadel
NRC Senior Resident Inspector
Oconee Nuclear Station

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
1.	Section A p. A-1 A.1.a	See State of South Carolina FNF Plan	See State of South Carolina Fixed Nuclear Facility (FNF) Plan	editorial, spelled out initial acronym, FNF
2.	Section A p. A-3 A.1.e	Duty personnel are assigned to the Emergency Response Organizations as first responders since they can be readily reached after hours and weekends. Recall procedures for emergency response is shown as Figure A-2A (weekdays Monday-Thursday 0700-1730), Figure A-2B (after hours, weekends, holidays). Security will activate the ERO notification device. In the event Security is not available to perform the activities such as during a security threat the SM or designee will activate the ERO.	Duty personnel are assigned to the Emergency Response Organizations as first responders since they can be readily reached after hours and weekends. Recall procedures for emergency response is shown as Figure A-2. Security will activate the ERO notification device. In the event Security is not available to perform the activities such as during a security threat the SM or designee will activate the ERO.	Consolidated Recall procedure, same after hours as normal business hours.

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
3.	Section A old p. A-6 renumbered remaining pages.	<p>FIGURE A-2A</p> <p>DUKE ENERGY COMPANY OCONEE NUCLEAR SITE</p> <p><u>EMERGENCY ORGANIZATION RECALL - NORMAL WORKING HOURS*</u></p> <p>*Primary method - PA Announcement/ Notification Device Backup method - Nuclear Callout System</p>	deleted	merged Figures 2A and 2B, standard recall process regardless of business hours.
4.	Section A old p. A-7	<p>FIGURE A-2B</p> <p>DUKE ENERGY COMPANY OCONEE NUCLEAR SITE</p> <p><u>EMERGENCY ORGANIZATION RECALL - BACKSHIFT, HOLIDAYS, WEEKENDS*</u></p> <p>* Primary Method - PA Announcement/ Notification Device Back up Method - Nuclear Callout System</p>	see next line	

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
	Section A old p. A-7 new p. A-6	see previous line	<p style="text-align: center;">FIGURE A-2</p> <p style="text-align: center;">DUKE ENERGY COMPANY OCONEE NUCLEAR SITE</p> <p style="text-align: center;"><u>EMERGENCY ORGANIZATION RECALL – NORMAL WORKING HOURS and BACKSHIFT HOLIDAYS WEEKENDS*</u></p> <p style="text-align: center;">* Primary Method - PA Announcement/ Notification Device Back up Method - Nuclear Callout System</p>	merged Figures 2A and 2B, standard recall process regardless of business hours. Updated organizational titles
5.	Section A old p. A-8 new p. A-7For any classification above an Unusual Event, the Emergency Response Organization will be activated.For any classification above an Unusual Event, the Emergency Response Organization will be activated.	editorial, removed spacing in sentence.
6.	Section B p. B-20 1st sentence	...Figures A-1 [RM1]illustrates...	...Figures A-1 illustrates...	editorial, removed unintended rendering inject.
7.	Section B p. B-20 B.7	...The EOF Director would have overall emergency management responsibility for both events.[RM2]	...The EOF Director would have overall emergency management responsibility for both events.	editorial, removed unintended rendering inject.
8.	Section B	Oconee Memorial Hospital -	Oconee Memorial Hospital -	editorial,

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
	p. B-20 B.9	Greenville Health System	Prisma Health System	name change
9.	Section E p. E-1 E-1 & E.2	Figures A-2A and A-2B illustrate the methods used by the Shift Manager/Emergency Coordinator to activate the Emergency Response Organization.	Figure A-2 illustrates the method used by the Shift Manager/Emergency Coordinator to activate the Emergency Response Organization.	merged Figures 2A and 2B, standard recall process regardless of business hours
10.	Section F p. F-1 f.1.a	A back-up radio system provides alternate communications with Oconee and Pickens Counties emergency response organizations. (Figure F-2)	<i>deleted</i>	48.5 MHz radio removed from service.
11.	Section F p. F-1 f.1.b	On a monthly basis, a communication check is made to state and local government warning points within the Emergency Planning Zone. Communications during an emergency situation would be by DEMNET, site telephone system/commercial phone service, or by radio (where appropriate).	On a monthly basis, a communication check is made to state and local government warning points within the Emergency Planning Zone. Communications during an emergency situation would be by DEMNET, site telephone system/commercial phone service.	48.5 MHz radio removed from service.
12.	Section F p. F-2	<u>Emergency Radio System (Offsite System-Battery Backed)</u> Control Room Units 1&2 (48.5	<u>Emergency Radio System (Offsite System-Battery Backed)</u> Technical Support Center	48.5 MHz radio removed

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
	f.1.d 4)	MHZ) Technical Support Center Field Monitoring Teams (800 MHZ) Pickens County (48.5 MHZ) Oconee County (48.5 MHZ) State of South Carolina	Field Monitoring Teams (800 MHZ) State of South Carolina	from service.
13.	Section F p. F-4 f.1.e renumbered remaining pages	<u>Normal Working Hours (Figure A-2A)</u> 1. Have announced over the Public Address system that the Emergency Response Organization (Technical Support Center and Operations Support Center) are to be staffed. 2. Security will activate the ERO. If security is unable to activate the ERO, the SM (or designee) will activate the ERO. 3. Notify Duty Operations Engineer who verifies Plant Manager and Nuclear Operations Manager have been notified. 4. Initiate a Site Assembly (Required at an Alert or higher). 5. Individual groups will contact corporate personnel for support.	<u>Normal Working Hours and Weekends, Holidays, Backshift</u> 1. Have announced over the Public Address system that the Emergency Response Organization (Technical Support Center and Operations Support Center) are to be staffed. 2. Security will activate the ERO. If security is unable to activate the ERO, the SM (or designee) will activate the ERO. 3. Notify Shift Technical Advisor(STA) who verifies Plant Manager and Nuclear Operations Manager have been notified. 4. Initiate a Site Assembly (Required at a Site Area Emergency or higher). 5. Individual groups will contact corporate personnel for support.	merged Figures 2A and 2B, standard recall process regardless of business hours. Site Assembly changed to Site Area Emergency
	Section F old p. F-5 new F-4	<u>Weekends, Holidays, Backshift (Figure A-2B)</u> 1. Security will activate the ERO. If security is unable to activate		

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
	f.1.e	<p>the ERO,</p> <p>the SM (or designee) will activate the ERO.</p> <p>2. Duty Operations Engineer who verifies Plant Manager and Nuclear Operations Manager have been notified.</p> <p>3. Announce over the PA system that the Emergency Response Organization (Technical Support Center and Operations Support Center) is to be activated.</p> <p>4. Initiate a Site Assembly (Required at an Alert or higher).</p> <p>5. Individual groups will contact corporate personnel for support.</p>		
14.	Section F Fig. F-1	<u>DPC Offsite Radio System</u> Pickens LEC X Pickens EOC....X Oconee LEC....X	<u>DPC Offsite Radio System</u> Pickens LEC Pickens EOC Oconee LEC	48.5 MHz radio removed from service.
15.	Section F Fig. F-2	...The network consists of two radio frequencies which provide the following services:	The network consists of a radio frequency which provides the following services:	48.5 MHz radio removed from service.
16.	Section F Fig. F-2 re-lettered	A. 48.5 MHZ " Backup communications between ONS, Pickens County	<i>deleted</i>	48.5 MHz radio removed

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
	remaining step	Emergency Preparedness Agency and Oconee County Emergency Preparedness Agency. " Operating instructions are shown in the Emergency Telephone Directory. .		from service.
17.	Section H p. H-4 H.4	Division/Section Directives describe the Emergency Response Organization. Figures A 2A, A-2B depicts the procedure for recall of the Emergency Organization.	Division/Section Directives describe the Emergency Response Organization. Figure A 2A depicts the procedure for recall of the Emergency Organization.	editorial, fix reference step
18.	Section H p. H-9 H.11	Emergency Medical Supplies L-1, L-2, L-3	Emergency Medical Supplies L.2, L.4	editorial, correct reference steps
19.	Section H p. H-10 Fig H-1	Nuclear Eng	Reactor Eng	editorial, title change
20.	Section J p. J-3 J.7	... Procedure AD-EP-ALL-0109, Offsite Protective Action Recommendations, has been written to provide specific guidance for issuing protective action recommendations under various plant conditions to the Emergency Coordinator in the TSC and the EOF Director in the EOF Figure (J-1)....	... Procedure AD-EP-ALL-0109, Offsite Protective Action Recommendations, has been written to provide specific guidance for issuing protective action recommendations under various plant conditions to the Emergency Coordinator in the Control Room/TSC and the EOF Director in the EOF Figure (J 1)....	AD-EP-ALL-0109 implemented in the Main Control Room
21.	Section J	Per Appendix 2, initial protective	<i>deleted</i>	AD-EP-ALL-

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

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#	Page /Section	Current	Proposed Change	Reason
	p. J-3 J.7	actions are predetermined for Control Room use for general emergency conditions. Meteorological conditions at Oconee require a complex method for determining appropriate sectors to evacuate. The Control Room will typically recommend evacuation out to five miles and shelter out to ten miles which simplifies the process for determining the appropriate sectors to evacuate and to shelter.		0109 implemented in the Main Control Room
22.	Section J p. J-3 J.8	. (ONS-ETE-12142012, Rev. 000; ONS Evacuation Time Estimates (ETE) Dated 12/14/2012.)	(CSD-EP-ONS-0603-03, Oconee Evacuation Time Estimate Study)	editorial, reference title change
23.	Section J p. J-3 J.8	The Evacuation Time Estimates will be considered in evaluating protective action recommendations from the Technical Support Center or the Emergency Operations Facility.	The Evacuation Time Estimates will be considered in evaluating protective action recommendations.	ETE considered in all the ERF's
24.	Section J p. J-4 J.8	ONS' ETE analysis, using the 2010 decennial census data from the U.S. Census Bureau, was submitted to the NRC via §50.4 on December 14, 2012.	<i>deleted</i>	paragraph not required
25.	Section J p. J-4 J.9	For hostile action events, a range of protective actions for onsite workers including evacuation of essential personnel from potential target buildings, timely	<i>deleted</i>	paragraph not applicable to Licensee

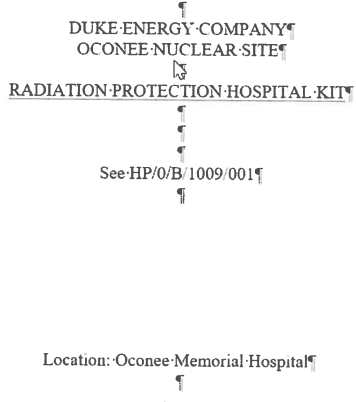
EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
		evacuation or relocation of non-essential site personnel, dispersal of critical personnel to safe locations, sheltering of personnel away from potential site targets and accountability of personnel after the attack are provided in emergency plan implementing procedures AP/0/A/1700/045, "Site Security Threats," RP/0/A/1000/010, "Procedure for Emergency Evacuation/Relocation of Site Personnel," RP/0/A/1000/009, "Procedure for Site Assembly".		NUREG-0654 Supp 4
26.	Section L blank cover	N/A	<i>deleted</i>	editorial, blank page
27.	Section L p.L-1 L.1	Local - Greenville Health System	Local - Prisma Health System	editorial, name change
28.	Section L p. L-2 L.2	...Figures L-1 and L-2 show locations and contents of trauma kits that are available for use by MERT personnel.	...PT/0/B/0250/032, Quarterly Inspection Of Emergency Medical Equipment, shows locations and contents of trauma kits that are available for use by MERT personnel.	editorial, move reference from Figure to respective paragraph, deleted figure.
29.	Section L	... (Figure L-3)	... (HP/0/B/1009/001, Emergency Equipment	editorial, move

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
	p. L-2 L.4		Inventory and Instrument Check)	reference from Figure to respective paragraph, deleted figure.
30.	Section L old p. L-3	<p style="text-align: center;">FIGURE L-1</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">DUKE ENERGY COMPANY OCONEE NUCLEAR SITE</p> <p style="text-align: center;">↓</p> <p style="text-align: center;"><u>TRAUMA KITS</u></p> <p style="text-align: center;">↓</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Contents</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">See PT/0/B/0250/032 for location of kits.</p>	<i>deleted</i>	editorial, reference moved to appropriate paragraph.
31.	Section L old p. L-4	<p style="text-align: center;">FIGURE L-2</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">DUKE ENERGY COMPANY OCONEE NUCLEAR SITE</p> <p style="text-align: center;">↓</p> <p style="text-align: center;"><u>MEDICAL EQUIPMENT</u></p> <p style="text-align: center;">↓</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">See PT/0/B/0250/032</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">↓</p>	<i>deleted</i>	editorial, reference moved to appropriate paragraph.

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
32.	Section L old p. L-5	<p style="text-align: center;"> FIGURE L-3  </p>	<i>deleted</i>	editorial, reference moved to appropriate paragraph.
33.	Section P p. P-1	P.2 & P.3 <u>Overall Authority</u>	P.2 <u>Overall Authority</u> P.3 The Support Services Manager...	editorial, split paragraph numbering to align to standards.
34.	Section P p. P-1	P.4 & P.5 <u>Review and Update of Emergency Plan</u>	P.4 <u>Review and Update of Emergency Plan</u> P.5 Approved revisions....	editorial, split paragraph numbering to align to standards.
35.	Section P p. P-2 P.9 remaining pages renumbered	The NOS Audit Manager will arrange for an independent review of Oconee Nuclear Station's Emergency Preparedness Program as necessary, based on an assessment against performance indicators, and as soon as reasonably practicable after a change occurs in personnel, procedures, equipment, or	The Nuclear Oversight (NOS) Audit Manager will arrange for an independent review of Oconee Nuclear Station's Emergency Preparedness Program at a frequency specified in 10CFR50.54(t). NOS will audit the Plan, Emergency Plan Implementing Procedures, Training programs, Drills and Exercises, facilities and	ensures independence of NOS Audits and aligned to planning standards.

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
		facilities that potentially could adversely affect emergency preparedness, but no longer than 12 months after the change. In any case, all elements of the emergency preparedness program will be reviewed at least once every 24 months. Guidance for performing the assessment against the performance indicators is provided in Administrative Procedure AD-NO-ALL-1001. The independent review will be conducted by the Independent Nuclear Oversight Division, which will include the following plans, procedures, training programs, drills/exercises, equipment, and State/local government interfaces:	equipment for conformance with 10CFR50.47, 10CFR50.54 and 10CFR50 Appendix E. The independent review will include the following plans, procedures, training programs, drills/exercises, equipment, and State/local government interfaces:	
36.	Section P p. P-2 P.9 (4)	4. Site Emergency Response Training Program	4. Emergency Response Training Program	Training programs are fleet process.
37.	Fig P1 A1b, A1d, A1e, A4, B1, B2, B3, B4, E1, E2, E3, E4a-n, F1a, F1c, F1e, H4, I5,	RP/O/A/1000/002 Control Room Emergency Coordinator Procedure	AD-EP-ALL-0111 Control Room Activation of the ERO	Superseded by implementation of fleet procedure.

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
38.	Fig P1 D1a, b, c	ONS E Plan ONS Emergency Plan	CSD-EP-ONS-0101-01 ONS EAL Technical Basis Document	moving EAL Tech Basis from EPLAN to CSD
39.	Fig P1 D1a,b,c, D2, H5, I1, I3a,b fixed remaining table cells	RP/0/A/1000/001 Emergency Classification	<i>deleted</i>	Main Control Room implementation of fleet classification procedure, AD-EP-ALL-0101. Already a reference.
40.	Fig P1 E1, E3, E4a-n, F1a, F1c, I5 fixed remaining table cells	RP/0/A/1000/015 A Offsite Communications From The Control Room	<i>deleted</i>	Main Control Room implementation of fleet notification procedure, AD-EP-ALL-0304. Already a reference.
41.	Fig P1 P.9	AD-NO-ALL-1001 Conduct of Audit	ONS E Plan ONS Emergency Plan	Preserve independence of audits and align to planning standard.
42.	Fig P1 J.8	ONS-ETE-12142012 ONS Evacuation Time Estimates (ETE) Dated 12/14/2012	CSD-EP-ONS-0603-03 Oconee Evacuation Time Estimate Study	editorial, reference title change
43.	Fig P1 J.9	AP/0/A/1700/045 Site Security Threats RP/0/A/1000/009 Procedure For Site	<i>deleted</i>	Not applicable to Licensee

EPLAN CHANGE SUMMARY 2020-001 - Sections A,B,E,F,H,J,L,P

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
		Assembly RP/0/A/1000/010 Procedure For Emergency Evacuation/Relocation Of Site Personnel		

EPLAN CHANGE SUMMARY 2020-001 - Appendices 2,3,4,5

Attachment to 50.54q				
CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
1.	App 2 p. 3	FAD - ON - EP-EAL-EALMATRIX, ONS NEI 99-01 REV 6 WALLCHART provides the Shift Manager in the Control Room with a conservative method of determining general emergency conditions based on reactor building and unit vent radiation monitors.	CSD-EP-ONS-0101-02, ONS WALLCHART provides the Shift Manager in the Control Room with a conservative method of determining general emergency conditions based on reactor building and unit vent radiation monitors.	EAL Matrix wallchart renamed to CSD for fleet consistency
2.	App 2 p. 3	Initial protective actions are predetermined for Control Room use for general emergency conditions. Meteorological conditions at Oconee require a complex method for determining appropriate sectors to evacuate. The control room will evacuate out to five miles and shelter out to ten miles which will simplify the process for determining the appropriate sectors to evacuate and to shelter.	Protective Action Recommendations(PARs) are determined in the Control Room using AD-EP-ALL-0109, OFFSITE PROTECTIVE ACTION RECOMMENDATIONS.	Implementation of standard control room procedures.
3.	App 3 blank first page	N/A	<i>Removed</i>	editorial, removed blank page that was a legacy NEDL printing item.
4.	App 3 p.1	A. Concept of Operations (Figure 2)	A. Concept of Operations	editorial, figure 2 was removed in previous revisions.
5.	App 3 p.3	Full Cycle Test Quarterly	Growl Test* Quarterly	correct error made in previous revision. Restore to FEMA Design Report testing guidance.
6.	App 3 p.3	Full-cycle* Annually	Full-cycle Annually	correct placement of asterisk.
7.	App 4 cover page	N/A	<i>deleted</i>	deleted blank cover page, not required.

EPLAN CHANGE SUMMARY 2020-001 - Appendices 2,3,4,5

Attachment to 50.54q				
CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
8.	App 4 p.1	See ONS-ETE-12142012, Rev. 000: ONS EVACUATION TIME ESTIMATES (ETE) DATED 12/14/2012.	See ONS-ETE-12142012, Rev. 000: ONS EVACUATION TIME ESTIMATES (ETE) DATED 12/14/2012. (CSD-EP-ONS-0603-03)	editorial, added new reference document that the ETE will be placed in for fleet consistency.
9.	App 5 p.1 renumbered pages.	N/A	<i>reduced spacing between lines listing LOA's in order to fit the entire list on one page.</i>	formatting, no content change.
10.	App 5 p.1	Duke Energy's Lincoln Combustion Turbine Facility	<i>deleted</i>	Supply Chain contingency, LOA was unnecessary.