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Serial: RA-22-0147
May 13, 2022

10 CFR 50.90
10 CFR 50.54(q)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325, 50-324 / Renewed License Nos. DPR-71 And DPR-62

Catawba Nuclear Station, Unit Nos. 1 and 2
Docket Nos. 50-413, 50-414 / Renewed License Nos. NPF-35 and NPF-52

Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400 / Renewed License No. NPF-63

McGuire Nuclear Station, Unit Nos. 1 and 2
Docket Nos. 50-369, 50-370 / Renewed License Nos. NPF-9 and NPF-17

Oconee Nuclear Station, Unit Nos. 1, 2, and 3
Docket Nos. 50-269, 50-270, and 50-287 / Renewed License Nos. DPR-38, DPR-47, and DPR-55

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261 / Renewed License No. DPR-23

William States Lee III Nuclear Station, Units Nos. 1 and 2
Docket Nos. 52-018, 52-019 / License Nos. NPF-101 and NPF-102

SUBJECT: Response to Request for Additional Information (RAI) Regarding License Amendment Request for Relocating the Duke Energy Emergency Operations Facility

REFERENCES:

1. Duke Energy letter, *License Amendment Request to Relocate the Duke Energy Emergency Operations Facility*, dated December 14, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21348A003)
2. NRC email, *Duke Common EOF Relocation - Request for Additional Information*, dated April 25, 2022 (ADAMS Accession No. ML22115A141)

Ladies and Gentlemen:

In Reference 1, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively referred to as Duke Energy) requested approval to relocate the Emergency Operations Facility (EOF) supporting Catawba Nuclear Station Units 1 and 2 (CNS), McGuire Nuclear Station Units 1 and 2 (MNS), Oconee Nuclear Station Units 1, 2, and 3 (ONS), Brunswick Steam Electric Plant Units 1 and 2 (BNP), Shearon Harris Nuclear Power Plant, Unit 1 (HNP), H. B. Robinson Steam Electric Plant, Unit 2 (RNP), and the future William States Lee III Nuclear Station (WLS). In Reference 2, the Nuclear Regulatory Commission (NRC) staff requested additional information regarding Reference 1.

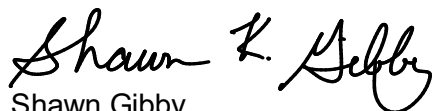
Enclosure 1 provides Duke Energy's response to the Reference 2 RAIs. The conclusions of the No Significant Hazards Consideration and Environmental Consideration in the original license amendment request are unaffected by this RAI response. There are no changes to the Duke Energy Common Emergency Plan and associated site specific annexes as a result of the responses to these RAIs.

No new regulatory commitments have been made in this submittal.

Duke Energy is notifying the states of North Carolina and South Carolina by transmitting a copy of this letter to the designated state officials. If you have additional questions, please contact Lee Grzeck, Acting Manager – Regulatory Affairs, at 980-373-1530.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on May 13, 2022.

Sincerely,



Shawn Gibby
Vice President – Nuclear Engineering

Enclosure:

1. Response to Request for Additional Information

cc:

L. Dudes, USNRC, Region II Regional Administrator
L. Haeg, USNRC NRR Project Manager for BNP
Z. Stone, USNRC NRR Project Manager for CNS
A. Hon, USNRC NRR Project Manager for HNP
J. Klos, USNRC NRR Project Manager for MNS
S. Williams, USNRC NRR Project Manager for ONS
T. Hood, USNRC NRR Project Manager for RNP
G. Smith, USNRC Senior Resident Inspector for BNP
J. Austin, USNRC Senior Resident Inspector for CNS
J. Zeiler, USNRC Senior Resident Inspector for HNP
A. Hutto, USNRC Senior Resident Inspector for MNS
J. Nadel, USNRC Senior Resident Inspector for ONS
M. Fannon, USNRC Senior Resident Inspector for RNP

NC Utilities Commission (swatson@ncuc.net)

SC Attorney General (HKirkland@scag.gov)

D. Crowley (david.crowley@dhhs.nc.gov), NC DHHS, Radiation Protection Section

L. Garner (garnerld@dhec.sc.gov), SC DHEC, Division of Waste Management, Radioactive & Infectious Waste Management

R. Mack (mackrs@dhec.sc.gov), SC DHEC, Bureau of Environmental Health Services

Enclosure 1
RA-22-0147

Enclosure 1
Response to Request for Additional Information

RAI-1

Requirement:

- 10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- Guidance in NUREG-0696, Section 4.2, "Location, Structure, and Habitability," provides guidance stating that for an EOF located at or beyond 10 miles of the site's Technical Support Center (TSC), the structure be "well engineered for design life of plant," and specifically states:

As an example of "well engineered," refer to the Uniform Building Code. In addition, it must be able to withstand adverse conditions of high winds (other than tornadoes) and floods. Winds and floods with a 100-yr [year] recurrence frequency are acceptable for a design basis."

Issue:

Enclosure 1, "Evaluation of the Proposed Change ," Section 3.2, "Location, Structure, and Habitability" states:

The David Taylor building was constructed in 1991 and is capable of withstanding wind loads and live loads equal to or greater than those specified in the 1978 North Carolina State Building Code (most recent at time of construction).

Request:

Please specify if the structure of the relocated Duke Common EOF can withstand adverse conditions of high winds (other than tornadoes) and floods with a 100-year recurrence frequency.

Duke Energy Response to NRC RAI-1

The David Taylor building was constructed to the 1978 North Carolina State Building Code. The 1978 North Carolina State Building Code provides wind load requirements in Section 1205, *Wind Loads*, and describes criteria for determining wind loads based on a recurrence frequency of 50 years. The David Taylor EOF is located in Mecklenburg County and is designed to withstand wind velocities of at least 80 miles per hour at the 50-year recurrence frequency.

The David Taylor EOF is not located within a Federal Emergency Management Agency (FEMA) flood hazard area, as it is outside the 0.2% annual chance (500-year recurrence) for flood hazards. Therefore, in accordance with the 1978 North Carolina Building Code, the David Taylor EOF is not designed to meet the flood plain construction standards described in Chapter 34 of the Code.

RAI-2

Requirement:

- 10 CFR 50.47(b)(14) requires periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

Issue:

Enclosure 1, "Evaluation of the Proposed Change," Section 3.10, "Conclusion for New EOF Location" states, in part:

In addition, Duke Energy is planning a two-site simultaneous demonstration drill, currently scheduled for April 27, 2022, using CNS and HNP. The drill at each site will involve activation of the emergency response organization and facilities, offsite notifications, dose assessment, protective action recommendations, and field monitoring team coordination.

Request:

Please identify the proposed date(s) and provide further details on the scope/extent of play for proposed drill to test the functionality of the relocated Duke Common EOF, involving simultaneous events at two sites, with at least one of which will be a multi-unit event.

Duke Energy Response to NRC RAI-2

Duke Energy is planning a dual site drill on Monday September 12, 2022, involving ONS and RNP. The simultaneous events at each site will involve activation of the emergency response organization and facilities, offsite notifications, dose assessment, protective action recommendations, and field monitoring team coordination, to test the full functionality of the new EOF location. In addition, the event at ONS will be a multi-unit event.

RAI-3

Requirement:

- 10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- Guidance in NUREG-0696, Section 4.6, "Communications," provides guidance stating that the EOF voice communications equipment shall include:

Hotline telephone (located in the NRC office space) on the NRC emergency notification system (ENS) to the NRC Operations Center;

Dedicated telephone (located in the NRC office space) on the NRC health physics network (HPN);

Issue:

Enclosure 1, "Evaluation of the Proposed Change," Section 3.6, "communications," provide a list of voice communication systems but does not specify if dedicated telephones for the ENS and HPN will be located in the NRC office space.

However, Section 3.6, "Communications," the April 29, 2016 application for consolidation of the current EOF stated, in part,

Also, telephones for the NRC Emergency Telecommunications System (ETS), the Emergency Notification System (ENS), and Health Physics Network (HPN), are available in the NRC work area.

Request:

Please specify what dedicated telephones will be located in the NRC office space of the relocated Duke Common EOF.

Duke Energy Response to NRC RAI-3

Duke Energy will provide telephones in the David Taylor EOF's NRC work area dedicated for the NRC Management Counterpart Link (MCPL), the Emergency Notification System (ENS), and Health Physics Network (HPN).