

**ATTACHMENT 1**  
**(SPAR OUTPUT)**

USING SPAR WITH A NEW BASIC EVENT INSERTED INTO THE SSF FAULT TREE AND THE RESULTS SLICED FOR THE NEW BASIC EVENT, THE CDF =  $5.96\text{E-}12/\text{HR}$

THE NEW BASIC WAS SSF-PZR-HTR WITH A FAILURE PROBABILITY OF  $1.5\text{E-}2$ . THIS IS A SURROGATE FOR 5 PSV LIFTS THAT COULD STICK OPEN. WITH A STUCK OPEN PSV THERE WOULD BE NO MITIGATION FUNCTIONS AVAILABLE & CORE DAMAGE WOULD ENSUE.

$$5.96\text{E-}12/\text{HR} * 24 \text{ HRS/DAYS} * 365 \text{ DAYS/YEAR} = 5.22\text{E-}8/\text{YEAR}$$

**ATTACHMENT 2**  
**(FULL SCOPE OUTPUT)**

## Sort/Slice Cut Set Report

Project-> OCONEE-FT      Fault Tree-> COREMELT  
 Mincut Upper Bound -> 6.772E-005      This Partition -> 2.642E-006  
 Slice Applied

Cut No.	% Total	% Cut Set	Frequency	Cut Sets
1	0.3	0.3	1.725E-007	IE-T1, NACSFDDGDM, /PACMFB1BHM, PACMFB2BHM PACXN01C4O
2	0.5	0.3	1.725E-007	IE-T1, NACSFDDGDM, PACMFB1BHM, /PACMFB2BHM PACXN02C4O
3	0.8	0.2	1.495E-007	IE-T1, NACSFDDGDM, /PACMFB1BHM, PACMFB2BHM PACN1OPLHE
4	1.0	0.2	1.495E-007	IE-T1, NACSFDDGDM, PACMFB1BHM, /PACMFB2BHM PACN2OPLHE
5	1.1	0.2	1.049E-007	FACX3XCDEX, FEFEFW1DHE, IE-T3, NACSFDDGDM PACX3TDBHM
6	1.3	0.2	1.036E-007	HHS0556RGO, IE-T12, NACSFDDGDM, WLSSW12DHE
7	1.4	0.1	4.160E-008	IE-T1, NACSFDDGDM, PAC04KVDHE, PACN1N2COM
8	1.4	0.1	4.027E-008	FEFEFW1DHE, FEFTDFPTPR, IE-T3, NACSFDDGDM PACX3TDBHM
9	1.5	0.1	3.536E-008	IE-T5WEATH, NACSFDDGDM, PACXCT4THF TACWFF2RHE
10	1.5	0.1	3.420E-008	IBSBWSTDHE, IE-FLN, NACSFDDGDM, NSFFLOODHE
11	1.6	0.1	3.420E-008	IE-FLN, NACSFDDGDM, NSFFLOODHE, WHSEWSTDHE
12	1.6	0.0	2.439E-008	HHS0555VVT, IE-T12, NACSFDDGDM, WLSSW12DHE
13	1.7	0.0	2.439E-008	HLS0771VVT, IE-T12, NACSFDDGDM, WLSSW12DHE
14	1.7	0.0	2.414E-008	IE-T1, NACSFDDGDM, /PACMFB1BHM, PACMFB2BHM PACS218SWT, PACS226SWT
15	1.8	0.0	2.414E-008	IE-T1, NACSFDDGDM, PACMFB1BHM, /PACMFB2BHM PACS219SWT, PACS22TSWT
16	1.8	0.0	2.364E-008	IE-T2, NACSFDDGDM, /PACMFB1BHM, PACMFB2BHM PACXN01C4O
17	1.8	0.0	2.364E-008	IE-T2, NACSFDDGDM, PACMFB1BHM, /PACMFB2BHM PACXN02C4O
18	1.9	0.0	2.294E-008	IE-T5WEATH, KK1BOTHHYM, NACSFDDGDM PAC0T5WDEX, TACWFF2RHE
19	1.9	0.0	2.048E-008	IE-T2, NACSFDDGDM, /PACMFB1BHM, PACMFB2BHM PACN1OPLHE
20	1.9	0.0	2.048E-008	IE-T2, NACSFDDGDM, PACMFB1BHM, /PACMFB2BHM PACN2OPLHE
21	2.0	0.0	1.863E-008	IE-T1, NACSFDDGDM, PACE2EPDEX, PACMFB1BHM /PACMFB2BHM, PACS22TSWT
22	2.0	0.0	1.863E-008	IE-T1, NACSFDDGDM, PACE1EPDEX, /PACMFB1BHM PACMFB2BHM, PACS226SWT
23	2.0	0.0	1.684E-008	IE-T1, NACSFDDGDM, PACMFB1BHM, PACMFB2BHF /PACMFB2BHM
24	2.1	0.0	1.684E-008	IE-T1, NACSFDDGDM, PACMFB1BHF, /PACMFB1BHM PACMFB2BHM

25 2.1 0.0 1.389E-008 IE-T5WEATH, NACSFDDGDM, PK0KEORCOM  
TACWFF3RHE  
26 2.1 0.0 1.258E-008 FEFRCIRDHE, IE-T3, NACSFDDGDM, PACX3TDBHM  
27 2.1 0.0 1.118E-008 IE-T1, NACSFDDGDM, /PACMFB1BHM, PACMFB2BHM  
PACS1CLLHE, PACS218SWT  
28 2.2 0.0 1.118E-008 IE-T1, NACSFDDGDM, PACE2CLLHE, PACMFB1BHM

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## Sort/Slice Cut Set Report

Project-> OCONEE-FT Fault Tree-> COREMELT  
Mincut Upper Bound -> 6.772E-005 This Partition -> 2.642E-006  
Slice Applied

Cut No.	% Total	% Cut Set	Frequency	Cut Sets
				/PACMFB2BHM, PACS22TSWT
29	2.2	0.0	1.118E-008	IE-T1, NACSFDDGDM, PACMFB1BHM, /PACMFB2BHM PACS219SWT, PACS2CLLHE
30	2.2	0.0	1.118E-008	IE-T1, NACSFDDGDM, PACE1CLLHE, /PACMFB1BHM PACMFB2BHM, PACS226SWT
31	2.2	0.0	1.091E-008	FEFTDFPTPS, IE-T3, NACSFDDGDM, PACX3TDBHM
32	2.2	0.0	1.085E-008	FEFTDFPTPR, IE-T12, NACSFDDGDM, TLOMFATDEX WLSLPSWDHE
33	2.3	0.0	1.062E-008	IBSBWSTDHE, IE-FMII, ILSFMIIDEX, NACSFDDGDM NSFFLOODHE
34	2.3	0.0	1.062E-008	IE-FMII, ILSFMIIDEX, NACSFDDGDM, NSFFLOODHE WHSEWSTDHE
35	2.3	0.0	1.040E-008	IE-T1, NACSFDDGDM, PACXN01C4O, PACXN02C4O
36	2.3	0.0	9.416E-009	IE-T5SUBF, NACSFDDGDM, PACS1EPDEX PDC1DIDBDM
37	2.3	0.0	9.416E-009	IE-T5SUBF, NACSFDDGDM, PACS2EPDEX PDC1DICBDM
38	2.4	0.0	9.407E-009	IE-T5SUBF, NACSFDDGDM, PACS2EPDEX /PACXCT3THM, PACXSB1BHM
39	2.4	0.0	9.407E-009	IE-T5SUBF, NACSFDDGDM, PACS1EPDEX /PACXCT3THM, PACXSB2BHM
40	2.4	0.0	9.369E-009	IE-T5SUBF, NACSFDDGDM, /PACMFB1BHM PACMFB2BHM, PACS1EPDEX
41	2.4	0.0	9.369E-009	IE-T5SUBF, NACSFDDGDM, PACMFB1BHM /PACMFB2BHM, PACS2EPDEX
42	2.4	0.0	9.254E-009	IE-T5FEEDF, KK1BOTHHYM, NACSFDDGDM PACLINEDEX
43	2.5	0.0	9.014E-009	IE-T1, NACSFDDGDM, PACN2OPLHE, PACXN01C4O
44	2.5	0.0	9.014E-009	IE-T1, NACSFDDGDM, PACN1OPLHE, PACXN02C4O
45	2.5	0.0	8.986E-009	IE-T5WEATH, NACSFDDGDM, PACS226SWT PACS22TSWT
46	2.5	0.0	8.624E-009	IE-T1, NACSFDDGDM, PACE2EPDEX, PACMFB1BHM /PACMFB2BHM, PACS2CLLHE

47 2.5 0.0 8.624E-009 IE-T1, NACSFDDGDM, PACE1EPDEX, /PACMFB1BHM  
 PACMFB2BHM, PACS1CLLHE  
 48 2.5 0.0 8.474E-009 FEFSWCHDHE, IE-T5SUBF, NACSFDDGDM  
 PACLOADDHE  
 49 2.6 0.0 7.812E-009 IE-T1, NACSFDDGDM, PACN1OPLHE, PACN2OPLHE  
 50 2.6 0.0 7.698E-009 FEFTDFPTPR, IE-T1, NACSFDDGDM, PACXCT3THM  
 WCW3POXYRD  
 51 2.6 0.0 7.674E-009 IBSBWSTDHE, ICWFMIDEX, IE-FMII, NACSFDDGDM  
 NSFFLOODHE  
 52 2.6 0.0 7.674E-009 ICWFMIDEX, IE-FMII, NACSFDDGDM, NSFFLOODHE  
 WHSEWSTDHE  
 53 2.6 0.0 7.488E-009 IE-T1, NACSFDDGDM, PAC04KVDHE, PACEESSCOM  
 54 2.6 0.0 7.451E-009 IE-T1, NACSFDDGDM, /PACMFB1BHM, PACMFB2BHM  
 PACS1EPDEX, PACS218SWT  
 55 2.7 0.0 7.451E-009 IE-T1, NACSFDDGDM, PACMFB1BHM, /PACMFB2BHM

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## Sort/Slice Cut Set Report

Project-&gt; OCONEE-FT

Fault Tree-&gt; COREMELT

Mincut Upper Bound -&gt; 6.772E-005 This Partition -&gt; 2.642E-006

Slice Applied

Cut No.	% Total	% Cut Set	Frequency	Cut Sets
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				PACS219SWT, PACS2EPDEX
56	2.7	0.0	7.354E-009	DDC1DCBBDM, DDCUN31DIM, IE-T5SUBF NACSFDDGDM, TACSFF2RHE
57	2.7	0.0	7.340E-009	FLS0137MVO, IE-T3, NACSFDDGDM, PACX3TDBHM
58	2.7	0.0	7.296E-009	IBSBWSTDHE, ICWFMNXDEX, IE-FMN, NACSFDDGDM NSFFLOODHE
59	2.7	0.0	7.296E-009	ICWFMNXDEX, IE-FMN, NACSFDDGDM, NSFFLOODHE WHSEWSTDHE
60	2.7	0.0	6.934E-009	IE-T5WEATH, NACSFDDGDM, PACS226SWT PDC1DIDBDM
61	2.8	0.0	6.934E-009	IE-T5WEATH, NACSFDDGDM, PACS22TSWT PDC1DICBDM
62	2.8	0.0	6.927E-009	IE-T5WEATH, NACSFDDGDM, PACS22TSWT /PACXCT3THM, PACXSB1BHM
63	2.8	0.0	6.927E-009	IE-T5WEATH, NACSFDDGDM, PACS226SWT /PACXCT3THM, PACXSB2BHM
64	2.8	0.0	6.899E-009	IE-T5WEATH, NACSFDDGDM, /PACMFB1BHM PACMFB2BHM, PACS226SWT
65	2.8	0.0	6.899E-009	IE-T5WEATH, NACSFDDGDM, PACMFB1BHM /PACMFB2BHM, PACS22TSWT
66	2.8	0.0	6.759E-009	FEF1516COM, HHPHPR0DHE, IE-T2, NACSFDDGDM
67	2.8	0.0	6.699E-009	IE-T5SUBF, NACSFDDGDM, PACLINEDEX /PACXCT3THM, PACXCT4THM
68	2.9	0.0	6.501E-009	FCWTBOCGPS, IE-T3, NACSFDDGDM, PACX3TDBHM

69 2.9 0.0 6.405E-009 IE-T5WEATH, NACSFDDGDM, PK0KEOSCOM  
TACWFF2RHE  
70 2.9 0.0 6.292E-009 HHP0TRBLHE, IE-T3, NACSFDDGDM, PACX3TDBHM  
71 2.9 0.0 6.292E-009 FEFTDFPLHE, IE-T3, NACSFDDGDM, PACX3TDBHM  
72 2.9 0.0 6.250E-009 FMS0087AVT, IE-T3, NACSFDDGDM, PACX3TDBHM  
73 2.9 0.0 6.102E-009 FEFSWCHDHE, HHPHPR0DHE, IE-T6, NACSFDDGDM  
74 2.9 0.0 5.987E-009 IE-T1, NACSFDDGDM, WCWLAK1DEX, WHS0154RGO  
WHSEWSTDHE, WHSP1KEDEX  
75 3.0 0.0 5.920E-009 IE-T5SUBF, NACSFDDGDM, PACLINEDEX  
PACXCT4THF  
76 3.0 0.0 5.749E-009 IE-T1, NACSFDDGDM, PACE2EPDEX, PACMFB1BHM  
/PACMFB2BHM, PACS2EPDEX  
77 3.0 0.0 5.749E-009 IE-T1, NACSFDDGDM, PACE1EPDEX, /PACMFB1BHM  
PACMFB2BHM, PACS1EPDEX  
78 3.0 0.0 5.701E-009 IE-T2, NACSFDDGDM, PAC04KVDHE, PACN1N2COM  
79 3.0 0.0 5.650E-009 IE-T5SUBF, NACSFDDGDM, PACXS01C4C  
PDC1DIDBDM  
80 3.0 0.0 5.650E-009 IE-T5SUBF, NACSFDDGDM, PACXS02C4C  
PDC1DICBDM  
81 3.0 0.0 5.644E-009 IE-T5SUBF, NACSFDDGDM, /PACXCT3THM  
PACXS01C4C, PACXSB2BHM  
82 3.1 0.0 5.644E-009 IE-T5SUBF, NACSFDDGDM, /PACXCT3THM  
PACXS02C4C, PACXSB1BHM  
83 3.1 0.0 5.621E-009 IE-T5SUBF, NACSFDDGDM, /PACMFB1BHM

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Sort/Slice Cut Set Report

Project-> OCONEE-FT Fault Tree-> COREMELT  
Mincut Upper Bound -> 6.772E-005 This Partition -> 2.642E-006  
Slice Applied

Cut No.	% Total	% Cut Set	Frequency	Cut Sets
				PACMFB2BHM, PACXS01C4C
84	3.1	0.0	5.621E-009	IE-T5SUBF, NACSFDDGDM, PACMFB1BHM /PACMFB2BHM, PACXS02C4C
85	3.1	0.0	5.207E-009	FEFTDFPTPR, IE-T5SUBF, NACSFDDGDM WLSFILTCOM
86	3.1	0.0	5.174E-009	IE-T1, NACSFDDGDM, PACE2CLLHE, PACMFB1BHM /PACMFB2BHM, PACS2CLLHE
87	3.1	0.0	5.174E-009	IE-T1, NACSFDDGDM, PACE1CLLHE, /PACMFB1BHM PACMFB2BHM, PACS1CLLHE
88	3.1	0.0	5.022E-009	FEFTDFPTPR, IE-T5SUBF, NACSFDDGDM TACSFF5RHE, WCW3POXYD
89	3.1	0.0	4.832E-009	DDCBATADEX, DDCUN31DIM, FEFTDFPTPR, IE-T3 NACSFDDGDM, T3TB1UXDHE
90	3.2	0.0	4.819E-009	IE-T5SUBF, KK1BOTHHYM, NACSFDDGDM PACLEESCTR, TACSFF3RHE

91 3.2 0.0 4.706E-009 DDC1DCBBYF, DDCUN31DIM, IE-T5SUBF  
NACSFDDGDM, PACLOOPDEX, TACSFF2RHE  
92 3.2 0.0 4.706E-009 DDC3DCABYF, DDCUN31DIM, IE-T5SUBF  
NACSFDDGDM, TACSFF2RHE  
93 3.2 0.0 4.614E-009 FMS093BAVO, IE-T3, NACSFDDGDM, PACX3TDBHM  
94 3.2 0.0 4.614E-009 FLS0138AVO, IE-T3, NACSFDDGDM, PACX3TDBHM  
95 3.2 0.0 4.614E-009 FHS0191RGO, IE-T3, NACSFDDGDM, PACX3TDBHM  
96 3.2 0.0 4.614E-009 FMS0093AVO, IE-T3, NACSFDDGDM, PACX3TDBHM  
97 3.2 0.0 4.509E-009 HHP0025MVO, IE-T7, NACSFDDGDM, PAC2CS1BLM  
98 3.2 0.0 4.509E-009 HHP0025MVO, IE-T8, NACSFDDGDM, PAC2CS1BLM  
99 3.3 0.0 4.486E-009 HHP0025MVO, IE-T8, NACSFDDGDM, /PAC3XS1BLM  
PACX3X8BLM  
100 3.3 0.0 4.486E-009 HHP0025MVO, IE-T7, NACSFDDGDM, /PAC3XS1BLM  
PACX3X8BLM



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**ATTACHMENT 3**  
**(COLORED BUS HELB)**



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 13, 2001

MEMORANDUM TO: John A. Zwolinski, Director, NRR:DLPM  
Mark A. Cunningham, Chief, RES:DRAA:PRAB  
John H. Flack, Acting Chief, RES: DSARE:REAHFB

FROM: Patrick W. Baranowsky, Chief *PWB*  
Operating Experience Risk Analysis Branch  
Division of Risk Analysis and Applications  
Office of Nuclear Regulatory Research

SUBJECT: TRANSMITTAL OF PRELIMINARY ASP ANALYSIS OF 1999  
OPERATIONAL CONDITION AT OCONEE

Enclosed is a copy of the preliminary Accident Sequence Precursor (ASP) Program analysis of the operational condition which was discovered at Oconee 1, 2, and 3, and reported in LER 269/99-001-01. The purpose of this memorandum is to provide you with a copy of the preliminary analysis (attachment 1) for internal review at the same time that it is sent out to the licensee for peer review.

The condition of interest in this analysis involves the potential for a postulated high energy line failure in the turbine building to degrade the ability of adjacent switchgear cabinets to perform their safety function. The risk significance associated with this condition has been analyzed under the Significance Determination Process (SDP) as well. We have identified the differences between the preliminary analyses performed under the SDP and the ASP Program, and communicated these differences to the Senior Reactor Analyst of the Regional Office.

Please review the preliminary ASP analysis and provide us with any comments that you may have. In order to facilitate incorporation of licensee and staff comments and preparation of the final report in a timely manner, consistent with the NRR and RES agreement on peer review, please provide your comments to us within 60 days from the date of receipt of this memorandum.

We are also requesting NRR/DLPM to send the preliminary ASP analysis to the licensee for peer review and comment. The draft of the standard transmittal letter is provided in attachment 2. The associated attachments to the transmittal letter will be provided separately to the NRR ASP Program liaison (Pat Madden).

If you have any questions about the analysis, attachments, or the ASP Program peer review process, please contact Sunil Weerakkody (415-6374) or Don Marksberry (415-6378).

Attachments: As stated

Multiple Addressees

2

MEMORANDUM DATED: 3 /13 /01

SUBJECT: TRANSMITTAL OF PRELIMINARY ASP ANALYSIS OF 1999 OPERATIONAL  
CONDITION AT OCONEE

**Distribution:**

OERAB RF	SCollins, NRR	REmch, NRR	WRogers, RII (SRA)
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OAR in ADAMS? (Y OR N) Y  
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Attachment 1

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**LER No. 269-99-001**

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**Licensee Event Report 269-99-001**

Event Description: Postulated high-energy line breaks in turbine building leading to failure of safety-related 4-kV switchgear

Event Date: February 24, 1999

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

**Event Summary**

Based on NRC inspection findings and subsequent discussions with the NRC staff, the Duke Energy Corporation (the licensee) determined that the emergency feedwater (EFW) system at Oconee may be vulnerable to single failures. On March 26, 1999, the licensee issued a licensee event report (LER) to report this as a condition outside the design basis (Refs. 1, 2). The inspection reports and the LER identified several other conditions at Oconee. One of the conditions identified in the LER was that certain postulated high-energy line breaks (HELBs) in the turbine building could have resulted in the loss of the 4160-volt engineered safeguards switchgear (SWGR). This analysis assesses the risk significance of the postulated breaks.

The conditional core damage probabilities (CCDP) associated with this condition over a one-year period for Oconee Units 1, 2, and 3 are  $9.6 \times 10^{-5}$ ,  $4.8 \times 10^{-5}$ , and  $4.6 \times 10^{-5}$  per year, respectively. The nominal core-damage probability (CDP) of Oconee Units 1, 2, and 3 over a one-year period is  $2.6 \times 10^{-5}$ .

The differences in the design in Reactor Coolant Pump (RCP) seals cause the difference in the CCDP among the units. The RCPs at Oconee Unit 1 have seal assemblies manufactured by Westinghouse which consist of O-rings that were not qualified for high temperatures and pressures. The RCPs at Oconee Units 2 and 3 have reactor coolant pumps whose seals were manufactured by Bingham.

**Event Description**

Figures 1 and 2 show the core damage sequences resulting from a HELB in the turbine building, which disables all three 4-kV switchgear trains of a given unit located in Elevation 727 feet of turbine building. As shown in Figure 8-1 of the UFSAR (Ref. 3), all power supplies to the plant from normal and emergency sources (Offsite supply, Keowee Hydro, Lee station) go through these three 4-KV switchgear cabinets. The safe shutdown facility (SSF), which is common to all three units and which has its own AC and DC power supply from the SSF diesel and batteries will not be affected by the postulated HELB. Section 9.6 of the UFSAR (Ref. 3) provides the details of the SSF. Power to an auxiliary switchgear located in the auxiliary building will also remain available. However, manual-local action, which includes establishing connections using cables, is required to use this power source to supply the high-pressure injection pumps. This power source cannot supply power to the emergency feedwater (EFW) pumps. It can supply power to a station auxiliary service water pump (ASW) to inject into steam generators.

The loss of all AC power as a result of the loss of all three trains of SWGR generates an ESF signal, trips the reactor, the turbine, the condensate booster pumps, and the hotwell pumps, and fails the MFW system

**LER No. 269-99-001**

{See section 10.4.7.1.2 and 10.4.7.1.3 of the UFSAR (Ref. 3)}. Loss of the 4-kV cabinets cause the loss of the motor-driven EFW pumps. Since the non-safety 250-VDC panel which supports the turbine-driven pump start circuitry is located in the vicinity of the 4-kV switchgear cabinets, that DC supply may fail. Therefore, the turbine-driven emergency feedwater pump may have to be locally-manually started.

The SSF provides the shutdown capability in the event of the postulated HELB which fails all three switchgear cabinets. The reactor coolant makeup pump (RCM) of the SSF which is rated at 29 gpm provides RCP seal cooling and prevents RCP seal failure. There are three RCM pumps (one per each unit). The decay heat removal function will be accomplished by the auxiliary service water (ASW) pump located in the SSF building. There is one ASW pump which can support all three units. This pump is powered from the SSF diesel. In essence, the mitigation actions of this scenario is identical to the mitigating actions of a station black out event with the exception of the DC power unavailability to the turbine-driven emergency pumps<sup>1</sup>.

### **Modeling Details and Key Assumptions**

*Subset of HELBs that fail the three 4-kV switchgear trains:* HELBs can occur inside turbine buildings as a result of breaks in main steam lines, main feedwater lines, and breaks in other lines carrying steam or feedwater between high-pressure heaters, moisture separators, and turbines. A plant walkdown conducted during January 8-10, 2001<sup>2</sup>, led to the conclusion that breaks in approximately 20 percent of MFW and breaks in an auxiliary steam system pipe, which is about 200 feet in length, could fail all three SWGR cabinets. Reference 4 provides the basis for this conclusion. Reference 4 is provided as Attachment 2 to this writeup. Section 2 of Attachment 1 provides plant specific experience on HELBs (consequences of three HELBs which occurred at Oconee station). This plant specific experience augments a key conclusion drawn in Reference 4, which states that HELBs that occur in the basement of the turbine building are unlikely to fail all three 4-kV switchgear trains.

*Characteristics of the SWGR cabinets considered to select the subset of HELBs that fail the three 4-kV SWGR trains:* The three Oconee units received their operating licenses in 1973 (Oconee Units 1 and 2) and 1974 (Oconee Unit 3). Therefore, the 4-kV SWGR cabinets at Oconee are not qualified to the current standards provided by the National Electrical Manufacturer's Association (NEMA). To determine the susceptibility of these cabinets to steam or moisture intrusion and the consequential failures, characteristics of the SWGR cabinets were compared against the current standards. Key conclusions derived from this comparison are as follows:

- The SWGR cabinets have adequate protection against rain down of moisture.

<sup>1</sup> HELBs which fail one or two of the three switchgear trains are of low risk significance compared to the risk significance of those that fail all three switchgear trains. Section 1 of Attachment 1 provides the basis for this conclusion.

<sup>2</sup> An alternative approach to calculate the frequency of a HELBs capable of affecting SWGR cabinets would have been to use actual number of HELB events at nuclear power plants which lead to SWGR cabinet failures. However, since (a) the characteristics of the 4-kV SWGR cabinets at Oconee may differ from those at many other nuclear plants (i.e., SWGR cabinets at Oconee are vulnerable to steam or moisture intrusion,) and (b) the location and configuration of SWGR cabinets at Oconee is different from many other plants (located in turbine building with no separation), a plant specific analysis became necessary.



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- The SWGR cabinets do not have adequate protection against steam or moisture intrusion via ventilation inlets and outlets or via other openings such as unsealed doors.
- The risk from inadvertent actuation of fire sprinklers is negligible.
- Any HELB event that can flood the SWGR cabinets would cause SWGR failure due to steam intrusion into the cabinets. Therefore, the risk from flooding of the three 4-kV SWGR cabinets as a result of any HELB is a subset of the risk from steam or moisture intrusion associated with HELBs.

These conclusions were used to select the subset of HELBs capable of affecting all three 4-kV switchgear trains. Section 3 of Attachment 1 provides detail on the above conclusions.

*Contribution from MFW system to the frequency of a HELB:* Based on nuclear plant operating experience between 1970-2000, the average frequency of a MFW pipe break at a nuclear power plant is approximately  $8.3 \times 10^{-4}$  per critical-year<sup>3</sup>. Based on information collected during a plant walkdown conducted during January 8-10, 2001, approximately 20 percent of the breaks in the MFW system are capable of failing all three SWGR cabinets. Therefore, the frequency of MFW breaks capable of failing SWGR is approximately  $1.7 \times 10^{-4}$  per critical-year ( $\approx 20\%$  of  $8.3 \times 10^{-4}$ ). Section 4 in Attachment 1 provides details of this frequency calculation.

*Contribution from auxiliary steam lines to the frequency of a HELB:* A search of the NRC's LER database {Sequence Coding and Search System (SCSS) (Ref. 5)} identified 24 high-energy line failure events (Refs. 6-29). These events occurred between 1985-1999. Of these, ten events occurred at pressurized water reactors (PWRs) in pipes whose attributes are similar to the attributes of the auxiliary steam lines. Section 5 in Attachment 1 provides summaries of these ten events at PWRs and several other events during which electrical cabinets were affected as a result of high-energy line leaks or breaks. Based on this experience and operating reactor critical-years between 1985-1999 (850 PWR critical-years based on References 30, 31, 32, and 33), the frequency of HELBs inside the turbine building similar to those that may occur in the auxiliary steam lines is  $1.2 \times 10^{-2}$  per critical-year ( $\approx 10.5/850$ ).

Based on expert judgement (See Attachment 2 for details), the length of auxiliary steam piping in the vicinity of the SWGR cabinets is approximately 200 feet. This is about 1.8 percent of total piping similar to auxiliary steam pipes per unit. Therefore, the frequency of auxiliary steam line breaks capable of failing SWGR is approximately  $2.2 \times 10^{-4}$  per critical-year ( $\approx 0.018 \times 1.2 \times 10^{-2}$ ).<sup>4</sup> Section 6 in Attachment 1 provides additional details on this frequency calculation.

In consideration of changes to pipe break prevention programs instituted at nuclear plants (e.g., erosion/corrosion programs), it was necessary to consider if any observable trends in industry performance could be attributed to programs such as erosion/corrosion, etc.. There were no industry

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<sup>3</sup> The calculation implicitly assumes that the MFW break frequency at Oconee is equal to the average MFW frequency at nuclear plants. Considering the numbers of MFW equipment and general layout of these equipment in the turbine building at Oconee in comparison to the average nuclear power plant, this is a reasonable assumption.

<sup>4</sup> The calculation implicitly assumes that the break frequency at Oconee is equal to the average frequency at pressurized water reactors. Considering the numbers of equipment and general layout of these equipment in the turbine building at Oconee in comparison to the average pressurized water reactor, this is a reasonable assumption.

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wide trends in overall frequency noted (Refs. 44, 56). There were no known plant-specific design or operational features that would indicate that Oconee was outside (better or worse than) the industry norms.

*Frequency of HELBs that fail the three 4-kV SWGR cabinets:* The total frequency of a HELB capable of failing all three SWGR cabinets is the sum of the frequency contributions from MFW and auxiliary steam pipes. This equates to  $3.9 \times 10^{-4}$  per critical-year ( $= 1.7 \times 10^{-4} + 2.2 \times 10^{-4}$ ).

*Probability of recovery of switchgear failures due to harsh environment:* To recover the equipment, cabinets must be opened and allowed to dry. The dry-out process may take several hours or days.<sup>5</sup> Furthermore, considering the amount of energy released from a postulated HELB in the vicinity of the SWGR cabinets, the cabinets may sustain significant damage (including structural damage) rather than simply shorts as a result of the postulated HELB. Therefore, the probability of failure to recover the affected switchgear train during a 24-hour mission time is determined to be 1.0.

*Criticality factor (fraction of time the plant is at power) for Oconee Units 1, 2, and 3:* Based on Table H-3 of NUREG/CR-5750 (Ref. 32), the average criticality factors for Oconee Units 1, 2, and 3 for the time period 1987-1995 are 0.87, 0.88, and 0.84, respectively.

*Probability of failing to recover seal cooling capability within 10 minutes (event tree top event "RCM10M"):* Failure of the switchgear trains would fail RCP seal cooling. If RCP seal cooling could not be established using the safe shutdown facility (SSF) within about 10 minutes, there is some likelihood of RCP seal failure (NUREG/CR-5167, Ref. 35). The probability of failing to recover seal cooling within 10 minutes is approximately 0.44. This probability is dominated by the probability of operator error to establish SSF RCM (0.25) and probability of failure of SSF support systems (0.16). The bases for these probabilities are provided in Section 7 to Attachment 1.

*Probability of failing to recover seal cooling capability within 2 hours (event tree top event "RCM2HR"):* This event tree top event is used for Oconee Unit 1 only. If RCP seal cooling could not be established using the safe shutdown facility (SSF) within about 2 hours, for seal assemblies whose O-rings are not qualified, there is an additional likelihood of RCP seal failure due to O-ring failure (NUREG/CR-5167, Ref. 35). The probability of failing to recover seal cooling within 2 hours is approximately 0.24. This probability is dominated by the probability failure of SSF support systems (0.16). The bases for this probability is provided in Section 7 to Attachment 1.

*Probability of RCP seal failure if seal cooling is not recovered for 10 minutes (event tree top event "RCPSEAL"):* NUREG/CR-5167 (Ref. 35) provides failure probabilities for Westinghouse RCP seal assemblies. If seal cooling is not recovered for 10 minutes, the Rhodes model uses a total RCP seal failure probability (in the absence of seal cooling) of 0.22 for Westinghouse RCP seal assemblies that use improved O-ring material. Oconee Units 2 and 3 have RCP seal assemblies manufactured by Bingham.

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<sup>5</sup> S. Weerakkody (U.S. NRC), Private communications with W. Roughly (U.S. NRC).

**ATTACHMENT 4**  
**(EARTHQUAKE)**

Cutset Number	Cutset Freq.	Accident Sequences				
95	5.60E-07	CJOC DAMSIS	NACSFDDGDR	T0SMALLDEX		
96	5.24E-07	CONDENSIS	NACSFDDGDR	T0SMALLDEX		
94	3.14E-07	CINTAKESIS	NACSFDDGDR	T0SMALLDEX		
92	2.33E-07	C003B1T5IS	NACSFDDGDR	T0SMALLDEX		
97	1.69E-07	CTURSRGIS	NACSFDDGDR	T0SMALLDEX		
93	2.57E-08	CBURPIPSIS	NACSFDDGDR	T0SMALLDEX		
255	3.42E-07	CAUXSRGIS	CCSTSUPIS	NACSFDDGDR	T0SMALLDEX	
256	1.29E-07	CAUXSRGIS	COMPCLRSIS	NACSFDDGDR	T0SMALLDEX	
251	1.18E-07	C00BWSTIS	CCSTSUPIS	NACSFDDGDR	T0SMALLDEX	C00RBCUSIS
253	6.11E-08	C00BWSTIS	COMPCLRSIS	NACSFDDGDR	T0SMALLDEX	C00RBCUSIS
242	3.92E-08	CAUXSRGIS	CCCOPN1DHE	NACSFDDGDR	T0SMALLDEX	
252	1.48E-08	C00BWSTIS	CCSTSUPIS	NACSFDDGDR	T0SMALLDEX	-C00RBCUSIS
254	2.33E-07	C00BWSTIS	COMPCLRSIS	NACSFDDGDR	T0SMALLDEX	-C00RBCUSIS
893	3.83E-07	CKEOBATIS	CLEEFEDSIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
892	3.09E-07	CK600MCSIS	CLEEFEDSIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
895	2.79E-07	CKEOWCBSIS	CLEEFEDSIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
883	2.12E-07	C000CT5SIS	CKEOBATIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
882	1.87E-07	C000CT5SIS	CK600MCSIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
885	1.76E-07	C000CT5SIS	CKEOWCBSIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
896	1.73E-07	CKEOWEESIS	CLEEFEDSIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
870	1.33E-07	C000CT3SIS	CK600MCSIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
871	1.47E-07	C000CT3SIS	CKEOBATIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
873	1.26E-07	C000CT3SIS	CKEOWCBSIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
894	1.26E-07	CKEOSRGIS	CLEEFEDSIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
865	1.02E-07	C000CT3SIS	C000CT5SIS	CK600MCSIS	NACSFDDGDR	T0SMALLDEX
866	1.10E-07	C000CT3SIS	C000CT5SIS	CKEOBATIS	NACSFDDGDR	T0SMALLDEX
868	9.84E-08	C000CT3SIS	C000CT5SIS	CKEOWCBSIS	NACSFDDGDR	T0SMALLDEX
884	9.69E-08	C000CT5SIS	CKEOSRGIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
886	1.11E-07	C000CT5SIS	CKEOWEESIS	COFSITESIS	NACSFDDGDR	T0SMALLDEX
887	9.17E-08	C0230KVSIS	CK600MCSIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
888	1.02E-07	C0230KVSIS	CKEOBATIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
867	6.49E-08	C000CT3SIS	C000CT5SIS	CKEOSRGIS	NACSFDDGDR	T0SMALLDEX
869	6.59E-08	C000CT3SIS	C000CT5SIS	CKEOWEESIS	NACSFDDGDR	T0SMALLDEX
872	7.60E-08	C000CT3SIS	CKEOSRGIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
874	8.18E-08	C000CT3SIS	CKEOWEESIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
877	7.00E-08	C000CT5SIS	C0230KVSIS	CK600MCSIS	NACSFDDGDR	T0SMALLDEX
878	7.53E-08	C000CT5SIS	C0230KVSIS	CKEOBATIS	NACSFDDGDR	T0SMALLDEX
880	6.75E-08	C000CT5SIS	C0230KVSIS	CKEOWCBSIS	NACSFDDGDR	T0SMALLDEX
890	8.72E-08	C0230KVSIS	CKEOWCBSIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
891	5.67E-08	C0230KVSIS	CKEOWEESIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
863	2.46E-08	C000CT3SIS	C000CT4SIS	C000CT5SIS	NACSFDDGDR	T0SMALLDEX
864	2.68E-08	C000CT3SIS	C000CT4SIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
876	1.88E-08	C000CT4SIS	C0230KVSIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
879	4.49E-08	C000CT5SIS	C0230KVSIS	CKEOSRGIS	NACSFDDGDR	T0SMALLDEX
881	4.55E-08	C000CT5SIS	C0230KVSIS	CKEOWEESIS	NACSFDDGDR	T0SMALLDEX
889	5.24E-08	C0230KVSIS	CKEOSRGIS	CLEEFEDSIS	NACSFDDGDR	T0SMALLDEX
800	6.73E-09	C000CT3SIS	C00BWSTIS	CCCOPN1DHE	NACSFDDGDR	T0SMALLDEX
801	4.67E-09	C00BWSTIS	C0230KVSIS	CCCOPN1DHE	NACSFDDGDR	T0SMALLDEX
802	1.22E-08	C00BWSTIS	CCCOPN1DHE	COFSITESIS	NACSFDDGDR	T0SMALLDEX
875	1.74E-08	C000CT4SIS	C000CT5SIS	C0230KVSIS	NACSFDDGDR	T0SMALLDEX
	6.39E-06					

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**TABLE C-2**  
**COMPONENT FRAGILITIES USED IN THE OCONEE SEISMIC ANALYSIS**

Basic Event Name	Description	Median Fragility, $\hat{A}(g)$	$\beta_r$	$\beta_u$
C000CT3SIS	Seismically-Induced Failure Of Startup Transformer CT3	0.58	0.26	0.21
C000CT4SIS	Seismically-Induced Failure Of Transformer CT4	0.88	0.26	0.21
C000CT5SIS	Seismically-Induced Failure Of Transformer CT5	0.49	0.26	0.21
C000ICSSIS	Seismically-Induced Failure of the Integrated Control System Cabinets	0.35	0.24	0.18
C003BIT SIS	Seismically-Induced Failure of 4 kV Switchgear BIT, B2T, 3B1T & 3B2T	0.55	0.24	0.18
C00BWSTSIS	Seismically-Induced Failure Of The BWST	0.71	0.25	0.31
C00RBCUSIS	Seismically-Induced Failure of The Reactor Building Cooling Units	0.33	0.24	0.18
C0230KVSIS	Seismically-Induced Failure of Keowee Overhead Path	0.72	0.26	0.38
C03ATC4SIS	Seismic Failure of Area Termination Cabinet 3AT4 (Fails 3MS-94)	0.46	0.24	0.18
CABMFRMSIS	Seismically-Induced Failure Of Aux. Building Moment Frames	1.29	0.25	0.28
CAUXSRGSIS	Auxiliary Building Components Surrogate	0.48	0.24	0.18
CBURPIPSIS	Seismically-Induced Failure Of Buried Piping	1.40	0.20	0.57
CCSTSUPSIS	Seismically-Induced Failure Of Component Cooling Surge Tank Supports	0.24	0.24	0.18
CESFTCBSIS	Seismic Failure of ESFAS Termination Cabinets	0.35	0.24	0.18
CHTOVER SIS	Surrogate For Relay Chatter Failing Overhead Power Path	0.56	0.21	0.36
CINTAKESIS	Seismically-Induced Failure Of Intake Canal East Dike	0.58	0.32	0.34
CJOCDA MSIS	Seismically-Induced Failure Of Jocassee Dam Floods Site	0.49	0.40	0.32
CK600MCSIS	Seismic Failure of Keowee 600V ac MCCs 1XA and 2XA	0.41	0.24	0.18
CKEOBATSIS	Seismically-Induced Failure of Keowee Batteries	0.36	0.24	0.18
CKEOSRGSIS	Keowee Components Surrogate	0.60	0.24	0.18
CKEOWCBSIS	Seismic Failure of Keowee Control Boards	0.43	0.24	0.18
CKEOWEESIS	Seismically-Induced Failure Of Keowee Dam	0.58	0.32	0.34
CLEEFEDSIS	Seismically-Induced Failure Of 100 kV Lee Feeder	0.30	0.25	0.50
CLETDWNSIS	Seismically-Induced Failure Of The Letdown Coolers	1.10	0.24	0.18
CMSNWLLSIS	Seismically-Induced Failure of Masonry Block Walls	1.34	0.17	0.52
COFSITESIS	Seismically-Induced Failure Of Offsite Power Line Insulators	0.30	0.25	0.50
COMPCLRSIS	Seismically-Induced Failure Of Component Coolers	0.57	0.24	0.18

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**TABLE C-2**  
**COMPONENT FRAGILITIES USED IN THE OCONEE SEISMIC ANALYSIS**

Basic Event Name	Description	Median Fragility, $\hat{A}(g)$	$\beta_r$	$\beta_u$
CONDCLRSIS	Seismic Failure of Condensate Coolers	0.29	0.24	0.18
CONDENSSIS	Seismically-Induced Failure Of The Condenser / Hotwell	0.46	0.25	0.31
CPIPSUPIS	Seismically-Induced Failure Of Plant Piping Supports	1.77	0.46	0.43
CPOLDTKSIS	Seismic Failure of Polishing Demineralizer Tanks	0.38	0.24	0.18
CRCSPISIS	Seismically-Induced Failure Of A Large RCS Pipe	1.27	0.34	0.43
CRVENTRSIS	Seismically-Induced Failure Of The Reactor Vessel Internals	0.95	0.31	0.37
CRVSKRTSIS	Seismically-Induced Failure Of The Reactor Vessel Skirt	1.30	0.24	0.29
CSSFSRGSIS	SSF Components Surrogate	0.60	0.24	0.18
CSSFTRNSIS	Seismically-Induced Failure Of SSF 600/208 V ac Transformers	0.73	0.18	0.44
CTURSRGSIS	Turbine Building Components Surrogate	0.60	0.24	0.18
CVDC3DPSIS	Seismic Failure of 125/250 V dc Distribution Center 3DP	0.53	0.24	0.18

Comparison of licensee's Earthquake (EPRI)  
frequency & NUREG-1488 (LLL)  
show minimal deviation. Therefore,  
use of licensee curve acceptable.  
w/rogers

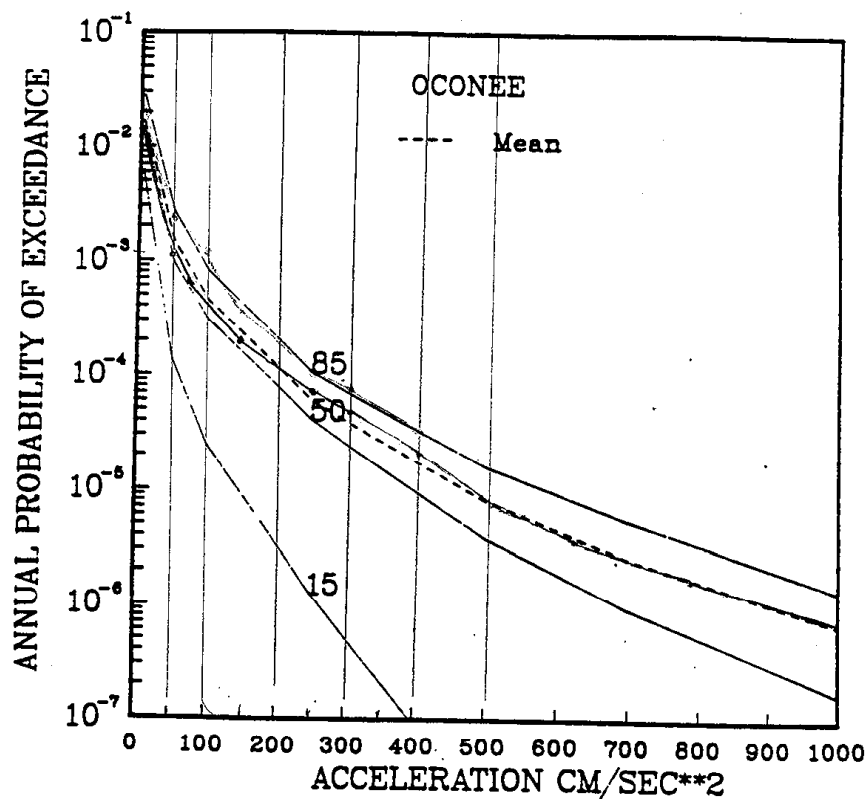


Figure 3.2-1 15th, 50th, 85th Fractiles and Mean Annual Probability of Exceedance of Peak Ground Acceleration

**ATTACHMENT 5**  
**(TORNADO)**



## Top 20 Tornado Cut Sets with SSF in Maintenance (Subsumed)

CS #	Probability	Event Name	Description
1	1.04E-05	FXTORNBH	U1 Tornado Damage To 4160V Buslines at Blockhouse (3 Units)
		NSSFSYSTRM	SSF Is In Maintenance
2	8.04E-06	F4TORNAD	Annual Frequency Of An F4 Intensity Tornado Striking Oconee Unit 3
		BACKHF4DEX	F4 Tornado Hits Keowee Hydro Station And Fails Emergency Power To CT4
		NSSFSYSTRM	SSF Is In Maintenance
3	7.17E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		-BACKHF3DEX	F3 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		NSSFSYSTRM	SSF Is In Maintenance
		BACF3TCDEX	F3 Tornado Damage To Unit 1 MFBs or Swgr 1TC
4	6.99E-06	F4TORNAD	Annual Frequency Of An F4 Intensity Tornado Striking Oconee Unit 3
		BACF4TCDEX	F4 Tornado Damage To Unit 1 MFBs or Swgr 1TC
		-BACKHF4DEX	F4 Tornado Hits Keowee Hydro Station And Fails Emergency Power To CT4
		NSSFSYSTRM	SSF Is In Maintenance
5	6.39E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		BACKHF3DEX	F3 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		NSSFSYSTRM	SSF Is In Maintenance
6	4.33E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		BF3BWSTDEX	F3 Tornado Missiles Cause Failure of BWST (& Damage To Turb Bldg)
		BF3BHBWDEX	Loss of Unit 1 Blockhouse MFBs given F3 Tornado Fails BWST
		-BACKHF3DEX	F3 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		NSSFSYSTRM	SSF Is In Maintenance
7	3.33E-06	F2TORNAD	Annual Frequency Of An F2 Intensity Tornado Striking Oconee Unit 3
		BACKHF2DEX	F2 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		NSSFSYSTRM	SSF Is In Maintenance
8	3.31E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		BTOF3F3DEX	F-3 Tornado Causes F-3 Damage to the Oconee Powerhouse
		-BACKHF3DEX	F3 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		BEF0ASWDHE	Operators Fail to Depressurize SGs and Align ASW (Tornado) Pump
		NSSFSYSTRM	SSF Is In Maintenance
9	3.18E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		BF3BWSTDEX	F3 Tornado Missiles Cause Failure of BWST (& Damage To Turb Bldg)
		-BACKHF3DEX	F3 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		BEF0ASWDHE	Operators Fail to Depressurize SGs and Align ASW (Tornado) Pump
		NSSFSYSTRM	SSF Is In Maintenance
10	3.17E-06	F2TORNAD	Annual Frequency Of An F2 Intensity Tornado Striking Oconee Unit 3
		-BACKHF2DEX	F2 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		NSSFSYSTRM	SSF Is In Maintenance
		BACF2TCDEX	F2 Tornado Damage To Unit 1 MFBs or Swgr 1TC
11	2.46E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		BTOF3F3DEX	F-3 Tornado Causes F-3 Damage to the Oconee Powerhouse
		BRCPORVPRC	Pilot-Operated Relief Valve 3RC-66 Fails To Close On Demand (steam relief)
		NSSFSYSTRM	SSF Is In Maintenance
12	2.42E-06	F4TORNAD	Annual Frequency Of An F4 Intensity Tornado Striking Oconee Unit 3
		BTOF4F3DEX	F-4 Tornado Causes F-3 Damage to the Oconee Powerhouse
		-BACKHF4DEX	F4 Tornado Hits Keowee Hydro Station And Fails Emergency Power To CT4
		BEF0ASWDHE	Operators Fail to Depressurize SGs and Align ASW (Tornado) Pump
		NSSFSYSTRM	SSF Is In Maintenance
13	2.36E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		BF3BWSTDEX	F3 Tornado Missiles Cause Failure of BWST (& Damage To Turb Bldg)

		BRCPORVPRC	Pilot-Operated Relief Valve 3RC-66 Fails To Close On Demand (steam relief)
		NSSFSYSTRM	SSF Is In Maintenance
14	2.15E-06	F2TORNAD	Annual Frequency Of An F2 Intensity Tornado Striking Oconee Unit 3
		BF2BWSTDEX	F2 Tornado Missiles Cause Failure of BWST (& Damage To Turb Bldg)
		BF2BHBWDEX	Loss of Unit 1 Blockhouse MFBs given F2 Tornado Fails BWST
		-BACKHF2DEX	F2 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		NSSFSYSTRM	SSF Is In Maintenance
15	1.97E-06	F2TORNAD	Annual Frequency Of An F2 Intensity Tornado Striking Oconee Unit 3
		BF2BWSTDEX	F2 Tornado Missiles Cause Failure of BWST (& Damage To Turb Bldg)
		-BACKHF2DEX	F2 Tornado Hits Keowee Hydro Station and Fails Emergency Power To CT4
		BEF0ASWDHE	Operators Fail to Depressurize SGs and Align ASW (Tornado) Pump
		NSSFSYSTRM	SSF Is In Maintenance
16	1.96E-06	F4TORNAD	Annual Frequency Of An F4 Intensity Tornado Striking Oconee Unit 3
		BTOF4F3DEX	F-4 Tornado Causes F-3 Damage to the Oconee Powerhouse
		BRCPORVPRC	Pilot-Operated Relief Valve 3RC-66 Fails To Close On Demand (steam relief)
		NSSFSYSTRM	SSF Is In Maintenance
17	1.91E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		BTOF3F3DEX	F-3 Tornado Causes F-3 Damage to the Oconee Powerhouse
		BEF2USTDEX	Tornado Damage to Multiple Units' UST or EFW Systems (Screening)
		BEFASW3DEX	Unit 3 ASW Alignment Failure due U1/U2 Event (Staffing)
		NSSFSYSTRM	SSF Is In Maintenance
18	1.91E-06	F4TORNAD	Annual Frequency Of An F4 Intensity Tornado Striking Oconee Unit 3
		BF4WALLDEX	Cond. Prob. of West Pen Room Failure (F4+ Damage on TB)
		BF4BWSTDEX	F4 Tornado Missiles Cause Failure of BWST (& Damage To Turb Bldg)
19	1.83E-06	F3TORNAD	Annual Frequency Of An F3 Intensity Tornado Striking Oconee Unit 3
		BF3BWSTDEX	F3 Tornado Missiles Cause Failure of BWST (& Damage To Turb Bldg)
		BEF2USTDEX	Tornado Damage to Multiple Units' UST or EFW Systems (Screening)
		BEFASW3DEX	Unit 3 ASW Alignment Failure due U1/U2 Event (Staffing)
		NSSFSYSTRM	SSF Is In Maintenance
20	1.52E-06	F4TORNAD	Annual Frequency Of An F4 Intensity Tornado Striking Oconee Unit 3
		BTOF4F3DEX	F-4 Tornado Causes F-3 Damage to the Oconee Powerhouse
		BEF2USTDEX	Tornado Damage to Multiple Units' UST or EFW Systems (Screening)
		BEFASW3DEX	Unit 3 ASW Alignment Failure due U1/U2 Event (Staffing)
		NSSFSYSTRM	SSF Is In Maintenance

7.68E-05

THIS CDF IS SLIGHTLY CONSERVATIVE & THE TRUE SOLUTION IS  
APPROXIMATELY 7E-5

MODIFYING FOR THE PERFORMANCE DEFICIENCY  
 $7E-5 * 6.5E-1 * 1.5E-2 = 6.82E-7$

Event Prob
1.04E-05
1.00E+00
3.59E-05
2.24E-01
1.00E+00
4.12E-05
1.55E-01
1.00E+00
2.06E-01
3.59E-05
2.51E-01
2.24E-01
1.00E+00
4.12E-05
1.55E-01
1.00E+00
4.12E-05
1.66E-01
7.50E-01
1.55E-01
1.00E+00
5.37E-05
6.20E-02
1.00E+00
4.12E-05
1.73E-01
1.55E-01
5.50E-01
1.00E+00
4.12E-05
1.66E-01
1.55E-01
5.50E-01
1.00E+00
5.37E-05
6.20E-02
1.00E+00
6.30E-02
4.12E-05
1.73E-01
3.45E-01
1.00E+00
3.59E-05
1.58E-01
2.24E-01
5.50E-01
1.00E+00
4.12E-05
1.66E-01

3.45E-01
1.00E+00
5.37E-05
7.10E-02
6.00E-01
6.20E-02
1.00E+00
5.37E-05
7.10E-02
6.20E-02
5.50E-01
1.00E+00
3.59E-05
1.58E-01
3.45E-01
1.00E+00
4.12E-05
1.73E-01
4.00E-01
6.70E-01
1.00E+00
3.59E-05
1.68E-01
3.16E-01
4.12E-05
1.66E-01
4.00E-01
6.70E-01
1.00E+00
3.59E-05
1.58E-01
4.00E-01
6.70E-01
1.00E+00

**ATTACHMENT 6**  
**(FIRE INITIATING EVENT)**

### **Initiating Event Development for Full Compartment Fires that Result in SSF Operation**

The fire ignition frequency estimates for the specific fire areas were calculated as follows:

(a) Cable Shaft - Based on a revised analysis of the fire ignition frequency for a large fire in the cable shaft (page 13, Responses to NRC RAI for the Oconee IPEEE, March 1999), the fire ignition frequency estimate is  $(9.6\text{E-}3/\text{year}) \times (0.0131) = 1.3\text{E-}4/\text{year}$ . This estimate was calculated using the estimated fire frequency of  $9.6\text{E-}3/\text{year}$  for a large fire in 1/3 of the auxiliary building (AEOD Report 97-03, J. Houghton) and the probability value of 0.0131 for the combined credit of fire growth, and failure of detection and suppression.

Based on licensee-provided information (March 3, 2003 e-mail to W. Rogers), the results of more detailed Fire Ignition Frequency calculations showed the fire frequency estimates with credit for manual suppression (the Cable Shaft has installed smoke ionization detectors for fire detection and a water sprinkler system of 0.1 spatial density of sprinklers that is manually activated by fire brigade responders to control the spread of fire within the area) and severity of fire in the cable shaft to be as follows:

Cable Shaft 796 foot level (near Cable Room) =  $3.8\text{E-}5/\text{year}$   
Cable Shaft 809 foot level (near Equipment Room) =  $4.0\text{E-}5/\text{year}$

(b) Cable Spreading Room - The fire ignition frequency estimate for a severe fire in the cable spreading room is calculated by summing the ignition frequencies for fixed and transient ignition sources. The fixed ignition sources are low voltage termination electrical cabinets in the Cable Spreading Room. Using the generic fire frequency estimate of  $3.2\text{E-}3/\text{year}$  for electrical cabinets in the Cable Spreading Room (page 10.3-4, EPRI FIVE) and a severity factor of 0.12 (page D-7, EPRI Fire PRA Implementation Guide), the fire ignition frequency for fixed ignition sources prior to manual suppression is estimated to be  $3.8\text{E-}4/\text{year}$ . The Cable Spreading Room has installed smoke ionization detectors for fire detection and a water sprinkler system of 0.1 spatial density of sprinklers that is manually activated by fire brigade responders to control the spread of fire within each area. Assuming that the failure probability of manual suppression is 0.1, the fire ignition frequency estimate for fixed sources is  $3.8\text{E-}5/\text{year}$ . Although an "equivalent" fire modeling analysis (McGuire NEI-00-01 Pilot Project) shows that the likelihood of cabinet-to-cabinet fire propagation may be low, it is assumed that there is a 10 percent fire propagation rate from one cabinet to another. Therefore, the fire ignition frequency for fixed ignition sources in the Cable Spreading Room is estimated to be  $(0.1) \times (3.8\text{E-}5/\text{year}) = 3.8\text{E-}6/\text{year}$ .

The transient ignition sources include general transient fires, cable fires caused by welding, and transient fires caused by welding and cutting. Based on licensee-supplied information, the fire frequency estimates were  $6.4\text{E-}05/\text{year}$  for general transient fires,  $6.3\text{E-}5/\text{year}$  for cable fires caused by welding, and  $3.8\text{E-}4/\text{year}$  for transient fires caused by welding and cutting. Using the manual suppression curves in Figures K-3 and K-4, Appendix K of EPRI Fire PRA Implementation Guide and a conservative 10-minute damage time, it was determined that the failure probabilities of manually suppressing transient fires and fires caused by welding within 10 minutes, are 0.44 and 0.08 respectively. The 10-minute damage time is considered conservative because cable fire

testing on armored cables at a heat load of 350kW showed the time to fire damage on the cables at greater than 30 minutes. Therefore, the total fire ignition frequency estimate for transient ignition sources is  $(6.4\text{E-}5/\text{year} * 0.44) + (6.3\text{E-}5/\text{year} * 0.08) + (3.8\text{E-}4/\text{year} * 0.08) = 6.4\text{E-}5/\text{year}$ .

The total fire ignition frequency estimate for the Cable Spreading Room is  $(3.8\text{E-}6/\text{year} + 6.4\text{E-}5) = 6.8\text{E-}5/\text{year}$ .

(c) Electrical Equipment Room - The Electrical Equipment Room contains the control cables in bundles in the Cable Shaft. Based on licensee-provided information (March 3, 2003 e-mail to W. Rogers), the results of more detailed Fire Ignition Frequency calculations showed the fire frequency estimate with credit for manual suppression and severity of fire in the Electrical Equipment Room to be  $1.0\text{E-}4/\text{year}$ . The Electrical Equipment Room has installed smoke ionization detectors for fire detection and a water sprinkler system of 0.1 spatial density of sprinklers that is manually activated by fire brigade responders to control the spread of fire within each area.

The total fire ignition frequency estimate for all of the above stated fire areas, **except for the Main Control Room**, affecting the armored LP-19 or LP-20 cables, with credit for fire growth and failure of detection and suppression, is calculated to be  $(3.8\text{E-}5/\text{year} + 4.0\text{E-}5/\text{year} + 6.8\text{E-}5/\text{year} + 1.0\text{E-}4/\text{year}) = 2.5\text{E-}4/\text{year}$ .

(d) Main Control Room - Unit 1 / 2: This is a common Main Control Room (MCR) with 89 electrical cabinets estimated in the area. The generic fire ignition frequency estimate for Control Rooms is  $9.5\text{E-}3/\text{year}$  (Table 4-2, EPRI TR-105928). There are no fire walls between the MCR boards. Based on Sandia electrical cabinet fire tests, it is assumed that it takes at least 15 minutes for fire propagation to adjacent cabinets before the smoke build-up requires MCR evacuation (See Appendix H-1 of EPRI TR-105928 for guidance on fire spread between electrical cabinets).

Using the Control Room Fire manual suppression curve in Appendix M of EPRI Fire PRA Implementation Guide and a 15-minute time available for suppression prior to smoke build-up requiring control room evacuation, it was determined that the failure probability of manually suppressing a fire in the MCR within 15 minutes is  $3.4\text{E-}3$ . Therefore, the fire ignition frequency estimate for fire affecting the common Unit 1 / 2 MCR with credit for manual suppression is  $(2 * 9.5\text{E-}3/\text{year}) * (3.4\text{E-}3) = 6.46\text{E-}5/\text{year}$ .

Unit 3: This is a separate control room and full compartment fire frequency is  $(9.5\text{E-}3/\text{year}) * (3.4\text{E-}3) = 3.23\text{E-}5$ .

(e) Turbine Building - The licensee's IPEEE was used directly. A synopsis of the IPEEE analysis is provided below:

For an all-consuming fire of the turbine building, the credible ignition source was determined to be the turbine's oil system. With zero fires causing loss of the turbine building reported the ignition frequency was derived by::

$$\Phi(A) = \chi^2_{50} (2n+1)^{1/2T} = 1.7\text{E-}4/\text{yr}$$

$\Phi(A)$  is the frequency

$\chi^2_{50}$  is the variate at the 50% cumulative level or 0.455 to the Chi-Squared distribution

T is the number of years of experience of 1303.6 unit years between 1980 & 1993

N is the number of events or 0 in the 1980 to 1993 time

An automatic suppression system was credited with a failure probability of 0.1. Therefore, the initiating event frequency requiring SSF use was  $1.7E-4 * 0.1 = 1.7E-5$ .