

March 5, 2012

LICENSEE: DUKE ENERGY CAROLINAS, LLC

FACILITY: OCONEE NUCLEAR STATION UNITS 1, 2, AND 3

SUBJECT: SUMMARY OF A TELECONFERENCE ON FEBRUARY 23, 2012, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND DUKE ENERGY CAROLINAS, LLC REGARDING COMMENTS MADE BY DUKE ENERGY CAROLINAS, LLC, CONCERNING THE ISSUANCE OF THE SCREENING ANALYSIS REPORT FOR GENERIC ISSUE 204, "FLOODING OF NUCLEAR POWER PLANT SITES FOLLOWING UPSTREAM DAM FAILURES"

In preparation of the U.S. Nuclear Regulatory Commission (NRC) issuing the Screening Analysis Report for Generic Issue (GI) 204, "Flooding of Nuclear Power Plant Sites Following Upstream Dam Failures," the NRC requested Duke Energy Carolinas, LLC (the licensee) to provide comments concerning security related information in the portions of the GI 204 Screening Analysis which discussed the Oconee Nuclear Station. By letter dated February 17, 2012, the licensee provided a total of 39 comments on the draft GI 204 Screening Analysis Report.

The NRC staff reviewed the licensee's comments, and on February 23, 2012, held a teleconference with the licensee to discuss the NRC's disposition of the licensee's comments. During the call the NRC stated the reason for accepting or not accepting the licensee's comments, and how the Screening Analysis would be changed to reflect the licensee's comments. In the table below is a summary of the disposition by the NRC of each comment made by the licensee in the February 17, 2012 letter.

COMMENT NUMBER	RESOLUTION
1	Not accepted – The proposed change was a minor wording change to be consistent with the UFSAR. George indicated that the NRC is interested in what text is sensitive and should be redacted rather than editorial comments.
2	Not accepted – Editorial comment
3	Accepted – The NRC will redact the Screening Analysis content
4	Not accepted – Editorial comment
5	Not accepted – Editorial comment
6	Editorial comment, however the NRC agreed to consider changing "current licensing basis" to "original licensing basis" and "did not consider" to "did not include."
7	Accepted – Content will be redacted
8	Accepted – Content will be redacted
9	Not accepted – Non-public references are presented in the Screening Analysis in accordance with NRC style guidance and are not being changed.
10	Not accepted – Non-public references are not being changed.
11	Accepted – Content will be redacted

COMMENT NUMBER	RESOLUTION
12	Not accepted – Editorial comment
13	This is an editorial comment about clarifying the use of emergency AC and alternate AC power sources. The NRC agreed to reconsider this comment.
14	Accepted – Content will be redacted
15	Accepted – Content will be redacted
16	Similar to comment 13, the reference to station blackout will be reconsidered.
17	Accepted – Content will be redacted
18	Not accepted – Editorial comment
19	Not accepted – Editorial comment
20	Not accepted – Editorial comment
21	Not accepted – Non-public references are not being changed. The comment did not propose redaction of content, but the content from the non-public reference will be redacted.
22	Not accepted – Editorial comment
23	The first part of comment 23 is not accepted since it is editorial. However, the second part of comment 23 is accepted and content will be redacted.
24	Not accepted – Non-public references are not being changed.
25	Not used. The draft of Duke's letter contained a comment 25. The paragraph referred to by the draft comment will be redacted.
26	There was discussion of the use of risk information regarding a possible Jocassee dam failure when the NRC has stated that it is to be treated deterministically. Failure of Jocassee due to earthquakes or overtopping was not included because it is not deemed credible, a position the NRC has accepted. NRC will consider moving the risk discussion to another section. In addition, a sentence in the referenced paragraph will be redacted.
27	Not accepted – Editorial comment
28	Not accepted – Non-public references are treated in accordance with NRC style guidance.
29 - 39	Comments 29 through 38 of the February 17 2012, letter are part of a recommended complete replacement for the Oconee Nuclear Station Section of NRC's Screening Analysis Report. The NRC did not accept these comments, because the comments did not pertain to the redaction of security related information.

As noted above in discussions with the licensee during the teleconference, the following were reconsidered by the NRC and will be modified in the Screening Analysis before it is issued.

- Comment 6 - Change the following sentence on page 7 of the Analysis as noted: "The *original* licensing basis for Oconee Nuclear Station did not *include* the impact of failure."
- Comment 26 - Add "(not deemed credible)" to the discussion of Jocassee failure probability due to earthquakes or overtopping on page 9 of the Analysis.

The follow actions requested by the licensee during the teleconference were reconsidered by the NRC, but will not be incorporated into the Screening Analysis.

- Comments 13 and 16 - Clarify the distinction between emergency power source and alternate AC power source and change the use of “station blackout” to loss of all AC power.
- Comment 26 - Move the discussion of risk estimates of rock filled dam failure to another section of the analysis.

If you have any questions, please call me at 301-415-1345.

Sincerely,

/RA/

John Stang, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-269, 50-270, and 50-287

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