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Oconee Site Flood Protection

NRC Meeting with
Duke Energy Carolinas, LLC
November 5, 2008



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Purpose

- Discuss concerns with SSF licensing basis
- Discuss short-term interim measures for ONS operation
- Discuss a long-term solution to the question of flood protection at the ONS site



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Concerns With SSF Licensing Basis

- SSF has protection against 5-ft or lower flood heights
 - The only inundation study on record had calculated flood heights in excess of 5 feet
- NRC issued 10 CFR 50.54(f) letter
- Licensee response insufficient based on:
 - Assertion that dam failures are not part of licensing basis
 - Duke's response in dismissing various credible failure modes of Jocassee Dam



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Short-term Operation

- Basis for continued operation
 - Low initiating event frequency
 - Accident sequence progression timelines
- Additional information
 - Plans for further modeling
 - Interim guidance
 - Bases for the proposed February 2009 modifications



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Long-term Operation

- Technical arguments in 10 CFR 50.54(f) response are insufficient
 - Argument on probabilities of failure inadequate
 - Inundation study not sufficient for licensing basis
- Technical basis needs to be re-established
 - Submittal from Duke in 1 year
 - NRC review in 1 year
- Analytical approach, if proposed, needs to follow current NRC guidance or have a clear basis for any deviation
- Engineered approach, if proposed, must have an adequate, conservative technical basis.



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