

Circle, Jeff

From: Mike Franovich *170112*
Sent: Thursday, July 03, 2008 4:41 PM
To: Melanie Wong; Leonard Olshan
Cc: Melanie Galloway; Mark Cunningham; Jeff Circle
Subject: RE: QUERY: Draft POP for July 18th briefing of Grobe and Boger

As is the standard practice in DRA, I will have to run this by the DRA front office. Here are my tentative changes. I've cast my die on where I think we need to be headed given certain constraints.

POP & AGENDA FOR OCONEE FLOOD BRIEFING

**On
 JULY 18, 2008**

PURPOSE: Brief Bruce Boger and Jack Grobe on the status of the ~~two options underway for the~~ Oconee flood issue and the generic efforts

OUTCOME: Understanding of staff's current effort and provide guidance on path forward

PROCESS: Discuss both Oconee options and the generic efforts using the following bullets.

Agenda:

I. ~~Introduction/Brief Background and 50.54(f) Letter for Bruce's effort~~ (Mike Franovich)

- A. ~~Option 1 -~~ 50.54(f) letter purpose and concurrence status
 - **Provides the licensee an opportunity to submit Duke's official position on the issue**
 - Questions whether Oconee adequately protects public health and safety from consequences of failure of Jocassee Dam
 - Cites plant licensing basis that states that Oconee was designed to withstand flooding conditions
 - States that Jocassee Dam Failure Inundation Study indicates flood height of 12.5 to 16.8 feet above grade, which is greater than 5-foot walls around SSF entrances
 - Letter with OGC. Expected date of concurrence ??
 - DORL Division Director, ADRO and ADES remain to concur.
 - ~~Consensus staff opinion prefers this option~~

B. Regulatory backfit evaluation

Option 1 - "Cost justified backfit" that is a substantial increase in safety (cost-benefit analysis)

- Preliminary analysis Indicates by PRA modifications up to \$13 million could be justified
- Estimated preliminary cost of modifications (higher walls, water-proof doors, etc.) approximately \$3 million
- Analysis to be completed and initiate management review by July 21

Option 2 - "Adequate protection backfit" may be issued without cost justification

- OGC provided insights and discussions regarding adequate protection in regulatory practice and from a Atomic Energy Act perspective
- Staff are working on a documented adequate protection evaluation

Option 3 - "Compliance backfit" may be issued without cost justification

- NRR has issued this type of backfit recently for D.C. Cook

II. Status of Generic Aspects and Other Support Efforts

- Surveyed FSARs and IPEEEs of potentially affected plants to understand scope of issue; Drafted Information Notice regarding Dam failure frequency estimates (Jim Vail, DRA)
- Draft Communication Plan (Leonard Olshan)
- OGC Backfit training projected in July 2008 (Leonard Olshan)
- LIC-504 training was conducted on May 30, 2008

III. Recommendations and Path Forward -

- Issue 50.54(f) letter
- Form a backfit review panel - Appoint a chair person; Division Directors and OGC representation on the panel

From: Melanie Wong *MR*
Sent: Thursday, July 03, 2008 1:40 PM
To: Leonard Olshan
Cc: Mike Franovich
Subject: QUERY: Draft POP for July 18th briefing of Grobe and Boger

Looks good, Lenny. Let's get some comments from Mike before we send out for comments to tier 1 team (Kamal, Jake and technical staff).

MW

From: Leonard Olshan *MR*
Sent: Thursday, July 03, 2008 11:03 AM
To: Melanie Wong
Subject: Draft POP for July 18th briefing of Grobe and Boger

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I. Introduction/Brief background for Bruce's effort (Mike Franovich)

- A. Option 1 - 50.54(f) letter
 - Questions whether Oconee adequately protects public health and safety from consequences of failure of Jocassee Dam
 - Cites plant licensing basis that states that Oconee was designed to withstand flooding conditions
 - States that Jocassee Dam Failure Inundation Study indicates flood height of 12.5 to 16.8 feet above grade, which is greater than 5-foot walls around SSF entrances

- Consensus staff opinion prefers this option
- B. Option 2 – Regulatory backfit analysis (cost-benefit analysis)
 - Indicates by PRA modifications up to \$13 million could be justified
 - Estimates preliminary cost of modifications (higher walls, water-proof doors, etc) \$3 million

II. Status of Options

A. Option 1 – 50.54(f) letter (Leonard Olshan)

- Letter with OGC. Expected date of concurrence ??.
- DORL Division Director, ADRO and ADES remain to concur.

B. Option 2 – Regulatory backfit analysis (cost-benefit analysis) (Brian Richter)

- Provide certainty to cost estimates
- Expects analysis to be completed and initiates management reviews the week of July 21st

III. Status of Generic Efforts

- Surveyed FSARs and IPEEEs of potentially affected plants to understand scope of issue; Drafted Information Notice (Kamal Manoly)
- Draft Communication Plan (Leonard Olshan)
- Backfit training projected in July 2008 (Leonard Olshan)