Oconee Site Flood Protection

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

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

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

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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