### April 5, 2002

LICENSEE: DUKE ENERGY CORPORATION

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

SUBJECT: OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 RE: SUMMARY OF

MARCH 20, 2002, WITH DUKE ENERGY TO DISCUSS THE METHODOLOGY FOR ANALYZING HIGH ENERGY LINE BREAKS OUTSIDE THE REACTOR

BUILDING (TAC NOS. MB3205, MB3206 AND MB3207)

On March 20, 2002, the Nuclear Regulatory Commission (NRC) and Duke Energy (the licensee) met in Rockville, Maryland to discuss the licensee's methodology for analyzing high energy line breaks (HELBs) outside the reactor building at Oconee Nuclear Station, Units 1, 2 and 3. Enclosed is the list of meeting attendees. The handouts provided by the licensee are accessible electronically from the Agencywide Documents Access and Management System (ADAMS) Public Electronic Reading Room on the internet at the NRC website, <a href="http://www.nrc.gov/reading-rm/adams/html">http://www.nrc.gov/reading-rm/adams/html</a>, under accession number ML020810033. Persons who do not have access to ADAMS, or who encounter problems in accessing the documents located in ADAMS, should contact the NRC PDR Reference staff by telephone at 1 800 397-4209 or 301 415-4737, or by e-mail to pdr@nrc.gov.

The licensee initially discussed this methodology in a letter dated October 15, 2001, which the licensee intends to revise. Following are some of the comments made during the meeting:

- 1. The NRC stated that the methodology appears to meet the intent of Standard Review Plan (SRP) 3.6.1.
- 2. The NRC interprets footnote 3 of SRP 3.6.2 to require the postulation of a terminal end break at the piping connection to the first normally closed valve in a system that is only partially pressurized.
- 3. The NRC stated that breaks cannot be excluded based on stresses and that a break should be postulated at terminal ends.
- 4. In clarifying Slide 11, the licensee stated that it will postulate a loss of offsite power (LOOP) with a feedwater line break. However, the NRC agreed that it is not necessary to assume a LOOP occurs concurrently with an HELB event unless the LOOP is a consequence of the HELB event.
- 5. The NRC said that the "Giambusso letter," (a letter dated from December 15, 1973, from A. Giambusso of the Atomic Energy Commission) stated that the plant should be able to be brought to cold shutdown following an HELB.
- 6. The licensee stated that the original licensing basis for Oconee allows the use of non-safety grade equipment for mitigating HELBs.

- 7. The NRC asked the licensee to address in the revised letter the controls that are in place for the emergency feedwater (EFW) system cross-connect valves.
- 8. The NRC stated that the licensee should be complete in its discussion of the various HELB assumptions that the licensee proposes to use in its analyses. The licensee should identify whether the assumption is a change to the existing licensing basis (including consideration of the Giambusso letter, post-Three Mile Island action plan items, EFW system upgrades, etc.). The licensee should also include justification for any change that is being made to the current licensing basis.
- 9. The NRC noted that, since the Standby Shutdown Facility (SSF) is being relied upon more than was originally envisioned, the licensee should reexamine the existing Technical Specification requirements for the SSF and assure that they are consistent with the importance of the SSF for event mitigation.

#### /RA/

Leonard N. Olshan, Project Manager, Section 1 Project Directorate II Division of Licensing Project Management Office of Nuclear Reactor Regulation

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

Enclosure: As stated

cc w/encl: See next page

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- 9. The NRC noted that, since the Standby Shutdown Facility (SSF) is being relied upon more than was originally envisioned, the licensee should reexamine the existing Technical Specification requirements for the SSF and assure that they are consistent with the importance of the SSF for event mitigation.

### /RA/

Leonard N. Olshan, Project Manager, Section 1 Project Directorate II Division of Licensing Project Management Office of Nuclear Reactor Regulation

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Enclosure: As stated

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# MEETING TO DISCUSS HIGH ENERGY LINE BREAKS OUTSIDE REACTOR BUILDING

## MARCH 20, 2002

# **MEETING ATTENDEES**

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