



Duke Energy Corporation

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August 19, 2002

U.S. Nuclear Regulatory Commission  
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SUBJECT: Duke Energy Corporation  
McGuire Nuclear Station, Units 1 and 2  
Docket Numbers 50-369 and 50-370  
Severe Accident Mitigation Alternatives

REFERENCE: 1) Letter, U.S. Nuclear Regulatory Commission to Duke Energy Corporation Dated May 6, 2002, SUBJECT: Request for Comments on the Draft Plant-Specific Supplement 8 to the Generic Draft Environmental Impact Statement Regarding McGuire Nuclear Station, Units 1 and 2 (TAC NOS. MB2021 and MB2022).

Section 5.2.7 of Reference 1 identifies one Severe Accident Mitigation Alternative (SAMA) that would provide back-up power to the hydrogen igniters for Station Blackout (SBO) event. The NRC staff states that since this SAMA does not relate to adequately managing the effects of aging during the period of extended operation, it does not need to be implemented as part of license renewal pursuant to 10 CFR 54. The NRC staff intends to pursue this SAMA as a current operating license issue. McGuire concurs with the NRC that this SAMA is not within the scope of license renewal and should be addressed separate from any license renewal proceedings.

McGuire concurs with the NRC staff that there may be a cost-beneficial plant design modification that can provide alternative power to the hydrogen ignition system during a SBO event. The NRC staff has determined that the hydrogen control issue is sufficiently important for PWRs with ice-condenser containment and BWR Mark III containments that the NRC has made the issue a Generic Safety Issue (GSI), GSI-189 - Susceptibility of Ice-Condenser and Mark III Containments to Early Failure from Hydrogen Combustion During a Severe Accident. McGuire has begun evaluating possible plant design and procedure changes to find a cost-beneficial resolution for this SAMA issue.

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Duke Energy has performed plant-specific probabilistic risk assessments (PRA), individual plant examinations, and system/component reliability studies to evaluate severe accidents at McGuire. Various design and procedure changes have been identified and implemented as a result of the above efforts. These changes have reduced the risk associated with major contributors identified by the McGuire PRA and have enhanced overall plant safety. Resolution of the SAMA issue identified in Reference 1 is consistent with the effort by Duke Energy to use risk insights to continuously improve the safety of McGuire Nuclear Station. McGuire is cooperating with the NRC in resolving GSI-189 as a current operating license issue.

If you have any questions regarding this submittal, please contact P.T. Vu at 704-875-4302.

Very Truly Yours,



H.B. Barron

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