July 25, 2003

LICENSEE: DUKE ENERGY CORPORATION

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

SUBJECT: SUMMARY OF JULY 1, 2003, MEETING TO DISCUSS THE DEFENSE-IN-DEPTH AND DIVERSITY ANALYSIS ASSOCIATED WITH THE DIGITAL UPGRADE OF THE REACTOR PROTECTIVE SYSTEM AND ENGINEERED SAFEGUARDS PROTECTIVE SYSTEM

On July 1, 2003, the Nuclear Regulatory Commission (NRC) met with Duke Energy (the licensee) to discuss the licensee's March 20, 2003, submittal that presented a defense-in-depth and diversity analysis associated with the digital upgrade of the reactor protective system (RPS) and the engineered safeguards protective system (ESPS). Enclosure 1 is a list of attendees. The March 20, 2003, submittal and 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 Web site, <u>http://www.nrc.gov/reading-rm/adams/html.</u> The accession number for the March 20, 2003, submittal is ML030920676, and the accession number for the licensee's handouts is ML031840460.

The licensee stated that it analyzed a spectrum of transients and accidents using realistic assumptions and achievable operator actions, assuming a common mode failure of RPS/ESPS. The acceptance criteria were met for all the transients and accidents except the large break loss-of-coolant (LBLOCA) accident. To acceptably mitigate the LBLOCA, the licensee stated that low pressure injection (LPI) would have to be initiated in about 2 minutes, which is less time than the licensee believed is achievable by the operators. Rather than add a diverse LPI actuation, the licensee is proposing to eliminate consideration of the LBLOCA based on leak detection capability and the low probability of a common mode failure of RPS/ESPS concurrent with a LBLOCA.

During the meeting, the NRC staff asked for, and the licensee agreed to provide, the following information:

- (1) The ratio of the critical crack size to the leakage crack size,
- (2) A clarification of the capability of the leakage detection systems and a docketed statement that 2 of the 3 systems meet Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems."
- (3) A docketed statement that the times assumed for operator actions are calculated from the initiation of the event, and
- (4) A discussion of the relevant differences between the Babcock and Wilcox Emergency Procedure Guidelines and the Oconee Emergency Operating Procedures.

The NRC stated that it intends to complete its review of the licensee's March 20, 2003, submittal by September 30, 2003.

Sincerely

/RA/

Leonard N. Olshan, Project Manager, Section 1 Project Directorate, 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

The NRC stated that it intends to complete its review of the licensee's March 20, 2003, submittal by September 30, 2003.

Sincerely

/**RA**/

Leonard N. Olshan, Project Manager, Section 1 Project Directorate, 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

Distributio PUBLIC PDII-1 R/F LOIshan CHawes JNakoski EHackett LMarsh/Fl	<u>n</u> : -			
OGC				
ACRS				
MKotzalas	5			
SArndt	11			
JBongarra	1			
CDoutt	•			
BGrimmel				
MChirama	l			
CLi				
PLoeser				
WLyon				
CMarco				
EMarinos				
FRinaldi				
JRivera				
RShaffer				
CSheng				
MWaterm	an			
BSmith, E	DO			
ADAMS Accession No.: ML Package: ML				
OFFICE	PDII-1/PM	PDII-1/LA	PDII-1/SC	
NAME	LOIshan	CHawes	JNakoski	
DATE	7/23/2003	7/24/2003	7/25/2003	

OFFICIAL RECORD COPY

-2-

LIST OF ATTENDEES

MEETING TO DISCUSS DEFENSE-IN-DEPTH AND DIVERSITY ANALYSIS ASSOCIATED WITH DIGITAL UPGRADE OF RPS/ESPS

JULY 1, 2003

<u>NRC</u>

DUKE ENERGY

- S. Arndt
- J. Bongarra
- C. Doutt
- B. Grimmel
- M. Chiramal
- C. Li
- P. Loeser
- W. Lyon
- C. Marco
- E. Marinos
- J. Nakoski
- L. Olshan
- F. Rinaldi
- J. Rivera
- R. Shaffer
- C. Sheng
- M. Waterman

<u>OTHER</u>

- J. Mauck, Framatome
- G. Lang, Westinghouse
- D. Popp, Westinghouse
- A. Sterdis, Westinghouse
- J. Stone, Calvert Cliffs
- R. Torok, Electric Power Research Institute
- D. Blanchard, Applied Reliability Engineering Incorporated

- T. Brown
- J. Fuller
- D. Garland
- L. Nicholson
- B. Shingleton
- G. Swindlehurst

Oconee Nuclear Station

cc: Ms. Lisa F. Vaughn Legal Department (ECIIX) Duke Energy Corporation 422 South Church Street Charlotte, North Carolina 28201-1006

Anne W. Cottingham, Esquire Winston and Strawn 1400 L Street, NW Washington, DC 20005

Manager, LIS NUS Corporation 2650 McCormick Drive, 3rd Floor Clearwater, Florida 34619-1035

Senior Resident Inspector U. S. Nuclear Regulatory Commission 7812B Rochester Highway Seneca, South Carolina 29672

Mr. Henry Porter, Director Division of Radioactive Waste Management Bureau of Land and Waste Management Department of Health and Environmental Control 2600 Bull Street Columbia, South Carolina 29201-1708

Mr. Michael A. Schoppman Framatome ANP 1911 North Ft. Myer Drive Suite 705 Rosslyn, VA 22209 Mr. L. E. Nicholson Compliance Manager Duke Energy Corporation Oconee Nuclear Site 7800 Rochester Highway Seneca, South Carolina 29672

Ms. Karen E. Long
Assistant Attorney General
North Carolina Department of Justice
P. O. Box 629
Raleigh, North Carolina 27602

Mr. C. Jeffrey Thomas Manager - Nuclear Regulatory Licensing Duke Energy Corporation 526 South Church Street Charlotte, North Carolina 28201-1006

Mr. Richard M. Fry, Director Division of Radiation Protection North Carolina Department of Environment, Health, and Natural Resources 3825 Barrett Drive Raleigh, North Carolina 27609-7721

Mr. Peter R. Harden, IV VP-Customer Relations and Sales Westinghouse Electric Company 6000 Fairview Road 12th Floor Charlotte, North Carolina 28210

Mr. Ronald A. Jones Vice President, Oconee Site Duke Energy Corporation P. O. Box 1439 Seneca, SC 29679