

April 6, 2009

MEMORANDUM TO: Alexander R. Klein, Chief
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

Andrew Howe, Acting Chief
PRA Licensing Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Paul Lain, Technical Lead **/RA S. Laur for/**
Fire Protection Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF SITE AUDIT TO SUPPORT THE REVIEW OF A
LICENSE AMENDMENT REQUEST FOR OCONEE NUCLEAR
STATION TO TRANSITION TO THE NFPA 805 FIRE
PROTECTION LICENSING BASIS (TAC NOS. MD0395, MD0396
AND MD0397)

A review team, consisting of Nuclear Regulatory Commission (NRC) staff and contractors from Pacific Northwest National Laboratory and Brookhaven National Laboratory participated in a regulatory audit at Oconee Nuclear Station, Units 1, 2 and 3 (ONS) from February 23 to 27, 2009. The regulatory audit supports the review of the license amendment request (LAR) by ONS to transition the site's fire protection licensing basis to comply with 10 CFR 50.48(c), which endorses with exceptions the National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition." ONS is one of two sites acting as a pilot plant for the transition process to the 10 CFR 50.48(c) licensing basis.

The purpose of the regulatory audit was to gain an understanding of the information needed to support the NRC staff's licensing decision regarding the LAR such that high quality requests for additional information (RAIs) could be crafted. Since the information submitted by Duke in support of the ONS LAR is under active review, any additional information needed to support the LAR review will be formally requested by the staff utilizing the RAI process in accordance with the office instruction LIC-101, "License Amendment Review Procedures."

The audit team consisted of 16 NRC and 4 National Laboratory staff. Since this was the first NFPA 805 transition regulatory audit, 8 of the 16 NRC staff attending were observers. Enclosure 1 lists the NRC staff and observers, National Laboratory staff, Duke and ONS staff, and licensee contractors that participated in the regulatory audit.

The Audit Team held an entrance meeting on Monday, February 23, 2009, with the licensee staff and contractors, licensee management and NRC Resident Inspectors. During the remainder of the audit, team members met in smaller groups per the Audit Plan (ML090290196). Duke staff also conducted a guided site tour, focusing on areas relevant to the regulatory audit. The areas toured included: the turbine building, the feedwater pumps, the cable spreading room, and the Safe Shutdown Facility.

The technical discussions fell into five categories: programmatic, LAR content, fire protection engineering, safe shutdown/circuit analysis, and fire probabilistic risk assessment (FPRA). Enclosure 2 contains a list of documents reviewed by the audit team.

At the conclusion of the site visit, the audit team participated in a summary exit meeting with ONS staff and management on February 27, 2009. The NRC staff expressed its appreciation to ONS for providing an informative and well-represented site visit for the regulatory audit team.

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

Enclosure:
As stated

cc: See next page

The Audit Team held an entrance meeting on Monday, February 23, 2009, with the licensee staff and contractors, licensee management and NRC Resident Inspectors. During the remainder of the audit, team members met in smaller groups per the Audit Plan (ML090290196). Duke staff also conducted a guided site tour, focusing on areas relevant to the regulatory audit. The areas toured included: the turbine building, the feedwater pumps, the cable spreading room, and the Safe Shutdown Facility.

The technical discussions fell into five categories: programmatic, LAR content, fire protection engineering, safe shutdown/circuit analysis, and fire probabilistic risk assessment (FPRA). Enclosure 2 contains a list of documents reviewed by the audit team.

At the conclusion of the site visit, the audit team participated in a summary exit meeting with ONS staff and management on February 27, 2009. The NRC staff expressed its appreciation to ONS for providing an informative and well-represented site visit for the regulatory audit team.

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

Enclosure:
As stated

cc: See next page

Distribution:

PUBLIC	LPL2-2R/F	RidsAcrcsAcnw&mMailCenter
MStambaugh, NRR	RidsNrrDorLPL2-2	RidsRgn2MailCenter
PLain, NRR	RidsNrrDraApla	RidsNrrDraAfpb
HBarrett, NRR	SLaur, NRR	RidsOgcRp
SWeerakkody, NRR	SShort, PNNL	

ADAMS Accession No.: ML090900390 (Pkg)

NRR-106

Memo: ML090900404, Enclosure 1: ML090900420, Enclosure 2: ML090900433

OFFICE	NRR/DRA	NRR/DRA/AFP	NRR/DRA/APLA	NRR/DRA/AFP
NAME	SLaur	PLain	AHowe R. Palla for	AKlein
DATE	03/31/2009	03/31/2009	04/06/2009	04/06/2009

OFFICIAL RECORD COPY