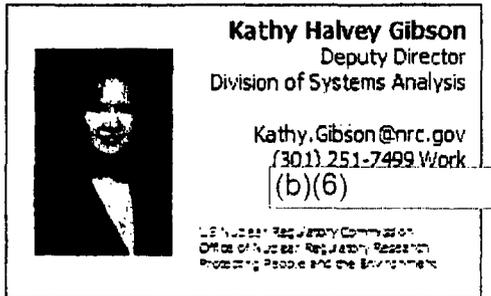


Greenwood, Carol

From: Gibson, Kathy - RES
Sent: Thursday, January 13, 2011 1:40 PM
To: Chang, Richard
Subject: FW: SOARCA
Attachments: Kathy Halvey Gibson.vcf; image001.jpg

As discussed.



9.23

From: Uhle, Jennifer
Sent: Thursday, January 13, 2011 11:21 AM
To: Sheron, Brian
Cc: Gibson, Kathy
Subject: SOARCA

Brian,

I wanted to try to explain the situation a bit. Kathy is getting a timeline put together to provide the details. In April, we were getting the peer review comments as well as the staff comments. We had over 1000 staff comments all but 300 have been resolved. 270 out of the 300 remaining are Charlie's and Jason's and we believe can wait until we go out for public comment. So really we only have 30 left which we don't believe will take us long. Based on the peer review comments as well as ACRS comment, we had to do some reanalysis of a Peach Bottom calculation pertaining to the failure of the SRV. This one was prioritized the highest because it could have resulted in prompt fatalities. There were other peer review issues as well, including the chance of liquification at Surry. The biggest one was the black start of the RCIC for Peach Bottom. More staff comments (from the Regions) were then provided about whether we could say the mitigation was likely. Jason had several meetings with the Regions and NRR (Mark Cunningham's group) to get that resolved. Meanwhile, Sandia was doing work on the SRV. Then the issue of the seismic PRA at Surry came up which assumed failure of the CST which would have caused all of the Surry analyses to be re-run. We consulted with Jon Ake and he was very doubtful about the liquefaction so that we felt comfortable with our assumption of the CST would withstand the event and we decided the news was too late to consider it. Around September timeframe it was clear that Sandia had overcommitted to NRC and that their staff was not spending full time on SOARCA. We had several calls with Sandia and highlighted that they needed to make SOARCA the priority. They kept promising us they would. Then KC Wagner left to go to the subcontractor which caused the delay in the ISLOCA analysis. Kathy and I brought more stuff in house, like the control over the NUREG, and considered getting the staff to do the analysis of ISLOCA, etc... Because of the complexity of the model, and Sandia bringing Kyle something or other up to speed, and their claim that the waiver would go through based on their conversations with management, and the fact that the staff was busy working on the staff comments, we believed that it was more efficient to have Sandia do the analysis. Although there have been a lot of contributing factors, I believe a root cause of the delays has been the need to get the staff comments resolved, the large effort associated with the peer review findings requiring reanalysis (since we agreed with them), and the extensive findings of the fact check which also required reanalysis, and Sandia hugely overcommitting on projects. Some of the same group of people working on SOARCA work on MELCOR changes for HTGR,

Level III PRA in DRA- the scoping study, MELCOR runs for new reactors, as well as containment analyses. We will have a good date by which we can go out for public comment. Because the ISLOCA can result in a prompt fatality, and we would be making claims about the project that are non-conservative, I believe it is critical that we do the analysis on ISLOCA. Before talking with you today, Kathy and I had already talked about doing some things in parallel to mitigate the schedule impact—like getting office concurrence on the document as it stands and then just doing red-line strikeout highlight on what changes based on the ISLOCA. The documentation is about 800 pages so we believe this would save another month. The five month delay reported to you today could be reduced if we did things like that. So we will get you the estimate later today.

As things had progressed on the study, we had communicated with Jim Lyons as he was steering committee chair. We apologize if we should have gone to you directly.

Thanks,

Jennifer