



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 17, 2012

Mr. Preston Gillespie
Site Vice President
Oconee Nuclear Station
Duke Energy Carolinas, LLC
7800 Rochester Highway
Seneca, SC 29672

SUBJECT: OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 (OCONEE 1, 2, AND 3) –
REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING 60-DAY
RESPONSE TO BULLETIN 2011-01, "MITIGATING STRATEGIES" (TAC NOS.
ME6457, ME6458, AND ME6459)

Dear Mr. Gillespie:

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360), to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The purpose of the bulletin was to obtain a comprehensive verification that licensees' mitigating strategies to maintain or restore core cooling, spent fuel cooling, and containment following a large explosion or fire were compliant with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.54(hh)(2). The bulletin requested information on the licensee's 10 CFR 50.54(hh)(2) mitigating strategies in light of the recent events at Japan's Fukushima Daiichi facility to determine if (1) additional assessment of program implementation is needed, (2) the current inspection program should be enhanced, or (3) further regulatory action is warranted.

The bulletin required two sets of responses pursuant to the provisions of 10 CFR 50.54(f). The first responses were due 30 days after issuance of the bulletin (June 10, 2011). By letter dated June 9, 2011 (ADAMS Accession No. ML11161A168), you provided a response to the first set of questions for Oconee 1, 2, and 3. The second responses were due 60 days after issuance of the bulletin (July 11, 2011). By letter dated July 11, 2011 (ADAMS Accession No. ML11193A261), you responded to this second set of questions.

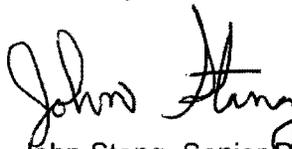
The NRC staff has reviewed the submitted information and determined that it needs additional information regarding your 60-day response to the bulletin. Please respond to the enclosed request for additional information within 30 days of the date of this letter.

P. Gillespie

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If you have any questions, please contact me at 301-415-1345.

Sincerely,

A handwritten signature in black ink that reads "John Stang". The signature is written in a cursive style with a large, looped initial "J".

John Stang, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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

Enclosure:
RAI

cc: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION (RAI)
REGARDING NUCLEAR REGULATORY COMMISSION (NRC) BULLETIN 2011-01,
"MITIGATING STRATEGIES"
DUKE ENERGY CAROLINAS, LLC
OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 (OCONEE 1, 2, AND 3)
DOCKET NOS. 50-269, 50-270, AND 50-287

On May 11, 2011, the NRC issued Bulletin 2011-01, "Mitigating Strategies" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360), to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The purpose of the bulletin was to obtain a comprehensive verification that licensees' mitigating strategies to maintain or restore core cooling, spent fuel cooling, and containment following a large explosion or fire were compliant with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.54(hh)(2). The bulletin requested information on the licensee's 10 CFR 50.54(hh)(2) mitigating strategies in light of the recent events at Japan's Fukushima Daiichi facility to determine if (1) additional assessment of program implementation is needed, (2) the current inspection program should be enhanced, or (3) further regulatory action is warranted.

The bulletin required two sets of responses pursuant to the provisions of 10 CFR 50.54(f). The first responses were due 30 days after issuance of the bulletin (June 10, 2011). By letter dated June 9, 2011 (ADAMS Accession No. ML11161A168), Duke Energy Carolinas, LLC (Duke, the licensee) provided a response to the first set of questions for Oconee 1, 2, and 3. The second responses were due 60 days after issuance of the bulletin (July 11, 2011). By letter dated July 11, 2011 (ADAMS Accession No. ML11193A261), the licensee responded to this second set of questions.

The NRC staff is in the process of reviewing the responses, and has determined that the following RAIs are required in order to complete the review.

1. Describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases. The NRC staff could not determine if you performed activities to ensure that these devices will be functional when needed.

Enclosure

2. Describe in detail the testing and inventory of communications equipment to ensure that it is available and functional when needed.

The bulletin requested that each licensee describe in detail the testing and control of equipment supporting the mitigating strategies to ensure that it will be available and functional when needed. Communications equipment needed to support the mitigating strategies was described in the NRC Safety Evaluation documenting the NRC review of your response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026), and typically includes radios, satellite phones, spare batteries, and chargers.

The NRC staff could not determine if you performed activities to ensure that communications equipment will be available and functional when needed. Specifically, the NRC staff has the following questions:

- a. Are all radios needed to support the mitigating strategies stored with the alternate fire brigade equipment?
 - b. Do you functionally check your radios?
 - c. Does your inventory of communications equipment include spare batteries and chargers?
3. Describe in detail how you ensure that a vehicle is available to move the B.5.b portable pump and other B.5.b equipment to the appropriate place when needed.

The bulletin requested that each licensee describe in detail the controls for ensuring equipment needed to execute the mitigating strategies will be available when needed. A vehicle is typically needed to implement the strategies since the portable pump and other equipment is stored away from target areas. The NRC staff could not determine if you performed activities to ensure that a tow vehicle would be available when needed.

4. Identify the equipment stored in the EDM trailer and Boggs box that is used to support the mitigating strategies.

Your response states that you inventory the equipment stored in the EDM trailer and Boggs box, but does not specify the equipment.

5. Describe in detail how you ensure that fire hoses, couplings, tie-downs, and discharge devices will be available when needed to implement your spent fuel pool spray strategy.

The bulletin requested that each licensee describe in detail the controls for ensuring equipment needed to execute the mitigating strategies will be available when needed. The NRC Safety Evaluation documenting the NRC review of your response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026) indicates that you rely upon fire hoses, couplings, tie-downs, and discharge devices to implement your spent fuel pool spray strategy. Your response to the bulletin states that you check hoses and couplings for damage, but does not identify any of the above items as part of your inventory of equipment used to support the mitigating strategies.

6. Describe in detail how you ensure the availability of offsite support relied upon for emergency response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it ensures the availability of offsite support, including a listing of offsite organization relied upon for emergency response. The NRC Safety Evaluation documenting the NRC review of your response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026) relied upon statements you made with respect to the following:

- a. Oconee and Pickens County Rural Fire Departments
- b. Oconee Memorial Hospital
- c. Nearby airports
- d. Local law enforcement agencies
- e. State of South Carolina
- f. Oconee and Pickens Counties Memorandum of Understanding to provide heavy equipment for debris removal

These offsite organizations were not included in your response to the bulletin. The NRC staff could not determine if these offsite organizations were still relied upon for emergency response and if any associated agreements were still in effect and being maintained.

P. Gillespie

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If you have any questions, please contact me at 301-415-1345.

Sincerely,

/RA/

John Stang, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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

Enclosure:
RAI

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