Options for Revising Oconee Flood CAL Due Dates

Discussion:

The flood CAL was issued on June 22, 2010. The CAL initially directed the licensee to submit a list of all modifications necessary to mitigate the Jocassee failure by November 30, 2010. This was modified and the licensee submitted the list on April 30, 2011. The CAL also directed the licensee to complete the modifications by November 30, 2011. This was modified to 30 months plus the regulatory review period once the RAIs were resolved. The modifications would be complete by February 28, 2016, assuming the RAIs are resolved on 8/30/2012, a 12 month regulatory review period (RRP), and 30 months to complete the modifications. The original CAL items and current due dates are listed in Table 1.

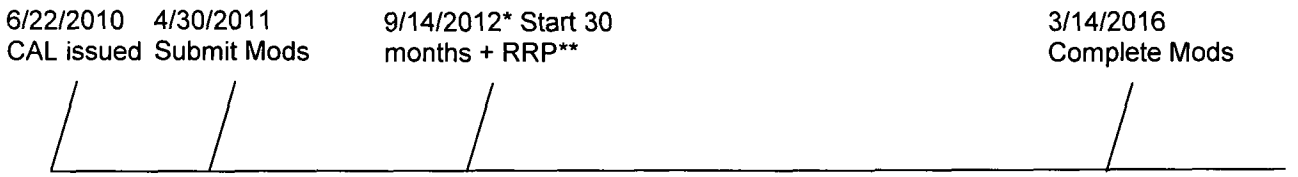
The licensee proposes to make the resolution of the CAL items parallel the resolution of Fukishima initiatives. The staff agrees to this in general. The licensee's proposed modifications are listed in Table 2. The licensee proposes to complete the updated flooding hazard re-evaluation report by March 12, 2013 (per Category 1 timeline) which is reasonable. However, they also propose completing the integrated assessment report by March 2015 and submitting a list of proposed modifications and an implementation schedule by August 2015. Initial staff response is that these are not reasonable for resolution of the flooding due to failure of the Jocassee Dam. For dam failure these are essentially complete and may just need adjustment if the flood level changes due to the flooding hazard re-evaluation. These timelines would be reasonable for newly identified issues such as PMP flooding on-site. The modifications to mitigate flooding from a Jocassee Dam failure would not be complete until February 2019 assuming August 2015 as the start date for a 12 month RRP and 30 months construction schedule.

It would be reasonable to modify the due date for completion of the modifications to relate it to completion of the flood hazard re-evaluation and maybe add a couple of months to allow revising proposed modifications if onsite flood levels change. The CAL currently says 30 months + regulatory review period (RRP) after resolution of all RAI's for CAL 2-10-003. Maybe revise to allow 3 months after completion of the hazard evaluation (due June 12, 2013) and then 30 months + RRP starting June 12, 2013. The modifications to mitigate flooding from a Jocassee Dam failure would be complete around December 2016. The NRC proposed CAL modifications are listed in Table 3.

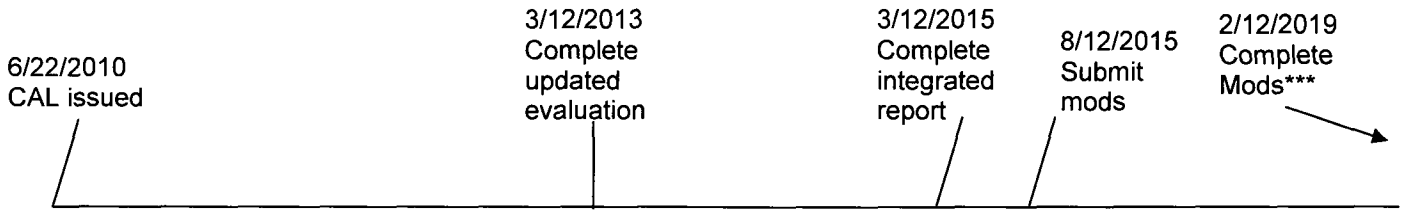
Figure 1 provides a graphical comparison of the current CAL, the licensee's proposed dates, and the staff's proposed dates.

We will need to discuss with OCO prior to modifying the CAL (either them or us).

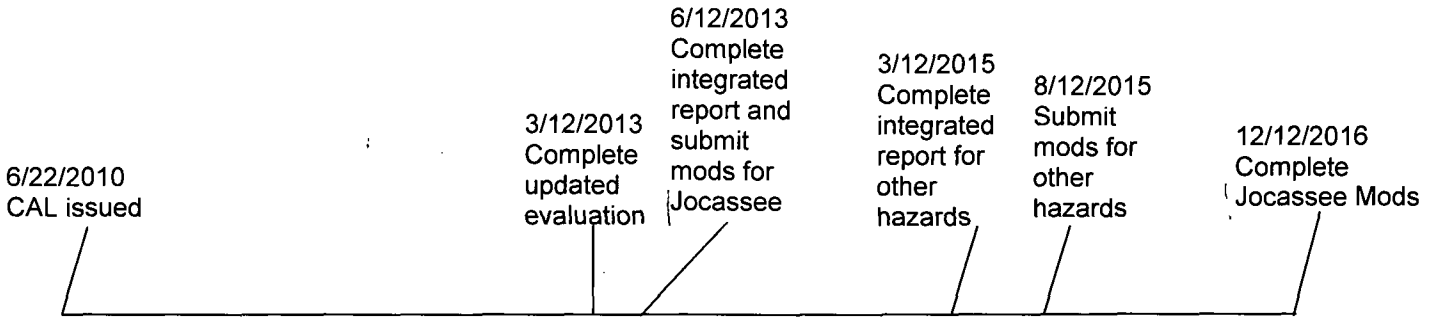
Summary:
Current CAL timeline would result in Jocassee flood modifications being complete around February 2016.
Oconee proposed changes would result in Jocassee flood modifications being complete around February 2019.
NRC proposed changes would result in Jocassee flood modifications being complete around December 2016.



Current CAL



Licensee Proposed Timeline



NRC Proposed Timeline

* Assume RAI letter issued 9/14/2012
** Assume RRP to be 12 months
***Assumes 42 months (30 + RRP)

Figure 1: Timelines

Table 1: Current CAL Commitments

No.	External Flooding Commitments	Due Date	Complete (Y/N)
1F	Compensatory measures implemented at the Oconee Site and Jocassee Dam to mitigate potential external flooding hazards resulting from a potential failure of Jocassee dam.	June 3, 2010	Y
2F	Submit all documentation necessary to demonstrate to the NRC that the inundation of the Oconee site resulting from the failure of the Jocassee Dam has been bounded.	August 2, 2010	Y
3F	Submit a list of all modifications necessary to adequately mitigate the inundation of the Oconee site to a potential failure of Jocassee dam.	~~November 30, 2010~~ April 30, 2011	Y
4F	Complete all modifications necessary to adequately mitigate the inundation of the Oconee site to a potential failure of Jocassee dam.	~~November 30, 2911~~ 30 Months + RRP after resolution of all RAI's for CAL 2-10-003	N

Table 2: Oconee Proposed External Fukushima Response Flooding Commitments

No.	External Flooding Commitments	Due Date	Complete (Y/N)
1FR	Compensatory measures implemented and maintained at the Oconee Site and Jocassee Dam to mitigate potential external flooding hazards resulting from a potential failure of Jocassee dam until modifications are completed.	June 3, 2010	Y
2FR	Complete updated flooding Hazard Reevaluation Report as required by March 12, 2012 10CRF 50.54(f) Recommendation 2.1 Flooding including a postulated failure of Jocassee dam.	March 12, 2013	N
3FR	Complete Integrated Assessment Report as required by March 12, 2012 10CRF 50.54(f) Recommendation 2.1 Flooding for the bounding flooding hazard.	March 12, 2015	N
4FR	Submit a list of all modifications and an implementation schedule to adequately mitigate the external flooding of the Oconee site for the bounding flooding hazard.	August 12 2015	N

Table 3: NRC Staff Proposed External Fukushima Response Flooding Commitments

No.	External Flooding Commitments	Due Date	Complete (Y/N)
1F	Compensatory measures implemented at the Oconee Site and Jocassee Dam to mitigate potential external flooding hazards resulting from a potential failure of Jocassee dam.	June 3, 2010	Y
2F	Submit all documentation necessary to demonstrate to the NRC that the inundation of the Oconee site resulting from the failure of the Jocassee Dam has been bounded.	August 2, 2010	Y
3FR	Complete updated flooding Hazard Reevaluation Report as required by March 12, 2012 10CRF 50.54(f) Recommendation 2.1 Flooding including a postulated failure of Jocassee dam.	March 12, 2013	N
4FR	Complete portions of Integrated Assessment Report required by March 12, 2012 10CRF 50.54(f) Recommendation 2.1 Flooding for the failure of Jocassee Dam. Note: Integrated Assessment Report for flooding hazards identified other than the failure of Jocassee dam will be completed by March 12, 2015.	June 12, 2013	N
5FR	Re-evaluate previously submitted list of modifications based on flooding Hazard Reevaluation Report. Provide revised list of modifications necessary to adequately mitigate the inundation of the Oconee site to a potential failure of Jocassee dam.	June 12, 2013	N
6FR	Complete all modifications necessary to adequately mitigate the inundation of the Oconee site to a potential failure of Jocassee dam. Note: A list of modifications and implementation schedule to mitigate flooding hazards other than the failure of Jocassee dam will be submitted by August 12, 2015.	30 Months + RRP after June 12, 2013	N