See, Kenneth

From: Goutam Bagchi
Sent: Thursday, October 16, 2008 11:09 AM
To: Mike Franovich; Raman Pichumani; Kenneth See; Christopher Cook
Cc: Melanie Galloway
Subject: Oconee: Upstream Dam Break

Mike,

I looked at RG 1.70 Standard Format (old version) Section 2.4.4, and it says that seismically induced dam failure should be considered. Rev 17 of Oconee UFSAR states the following in Section 2.4.4:

2.4.4 Potential Dam Failures, Seismically Induced

Duke has designed the Keowee Dam, Little River Dam, Jocassee Dam, Intake Canal Dike, and the Intake Canal Submerged Weir based on sound Civil Engineering methods and criteria. These designs have been reviewed by a board of consultants and reviewed and approved by the Federal Power Commission in accordance with the license issued by that agency. The Keowee Dam, Little River Dam, Jocassee Dam, Intake Canal Dike, and the Intake Canal Submerged Weir have also been designed to have an adequate factor of safety under the same conditions of seismic loading as used for design of Oconee.The construction, maintenance, and inspection of the dams are consistent with their functions as major hydro projects. The safety of such structures is the major objective of Duke's designers and builders, with or without the presence of the nuclear station.

The last sentence implies that the safety of "such structures" trumps over radiological safety governed by the NRC regulations because it was reviewed by a board of consultants!!!

I do not know the basis for the staff safety conclusion on the above section of the FSAR. It may be worth a due diligence effort on the part of DE staff to dredge up the NUREG, but I am not holding out much hope there. In my previous message this morning, I gave you as thorough an argument as I could as to why the Jocassee Dam seismic capability cannot be considered equivalent. Having said that, I would not go back and postulate a seismically induced dam break upstream of the plant to estimate the flood elevation at the site of the NPPs. Thanks,

Goutam

B-29