

Circle, Jeff

From: Mike Franovich *in file*  
 Sent: Thursday, July 03, 2008 4:41 PM  
 To: Melanie Wong; Leonard Olshan  
 Cc: Melanie Galloway; Mark Cunningham; Jeff Circle  
 Subject: RE: QUERY: Draft POP for July 18th briefing of Grobe and Boger

As is the standard practice in DRA, I will have to run this by the DRA front office. Here are my tentative changes. I've cast my die on where I think we need to be headed given certain constraints.

**POP & AGENDA FOR OCONEE FLOOD BRIEFING**

On  
**JULY 18, 2008**

**PURPOSE:** Brief Bruce Boger and Jack Grobe on the status of the ~~two options underway for the~~ Oconee flood issue and the generic efforts

**OUTCOME:** Understanding of staff's current effort and provide guidance on path forward

**PROCESS:** Discuss ~~both~~ Oconee options and the generic efforts using the following bullets.

Agenda:

I. ~~Introduction/Brief Background and 50.54(f) Letter for Bruce's effort~~ (Mike Franovich)

- A. ~~Option 1 -~~ 50.54(f) letter purpose and concurrence status
  - **Provides the licensee an opportunity to submit Duke's official position on the issue**
  - Questions whether Oconee adequately protects public health and safety from consequences of failure of Jocassee Dam
  - Cites plant licensing basis that states that Oconee was designed to withstand flooding conditions
  - States that Jocassee Dam Failure Inundation Study indicates flood height or 12.5 to 16.8 feet above grade, which is greater than 5-foot walls around SSF entrances
  - Letter with OGC. Expected date of concurrence ??
  - DORL Division Director, ADRO and ADES remain to concur.

~~• Consensus staff opinion prefers this option~~

B. Regulatory backfit evaluation

Option 1 - "Cost justified backfit" that is a substantial increase in safety (cost-benefit analysis)

- Preliminary analysis Indicates ~~by PRA~~ modifications up to \$13 million could be justified
- Estimated preliminary cost of modifications (higher walls, water-proof doors, etc.) approximately \$3 million
- Analysis to be completed and initiate management review by July 21

Option 2 - "Adequate protection backfit" may be issued without cost justification

- OGC provided insights and discussions regarding adequate protection in regulatory practice and from a Atomic Energy Act perspective
- Staff are working on a documented adequate protection evaluation

Option 3 - "Compliance backfit" may be issued without cost justification

- NRR has issued this type of backfit recently for D.C. Cook

## II. Status of Generic Aspects and Other Support Efforts

- Surveyed FSARs and IPEEEs of potentially affected plants to understand scope of issue; Drafted Information Notice regarding Dam failure frequency estimates (Jim Vail, DRA)
- Draft Communication Plan (Leonard Olshan)
- OGC Backfit training projected in July 2008 (Leonard Olshan)
- LIC-504 training was conducted on May 30, 2008

## III. Recommendations and Path Forward -

- Issue 50.54(f) letter
- Form a backfit review panel - Appoint a chair person; Division Directors and OGC representation on the panel

**From:** Melanie Wong *MWR*  
**Sent:** Thursday, July 03, 2008 1:40 PM  
**To:** Leonard Olshan  
**Cc:** Mike Franovich  
**Subject:** QUERY: Draft POP for July 18th briefing of Grobe and Boger

Looks good, Lenny. Let's get some comments from Mike before we send out for comments to tier 1 team (Kamal, Jake and technical staff).

MW

**From:** Leonard Olshan *MWR*  
**Sent:** Thursday, July 03, 2008 11:03 AM  
**To:** Melanie Wong  
**Subject:** Draft POP for July 18th briefing of Grobe and Boger

### POP & AGENDA FOR OCONEE FLOOD BRIEFING

On  
JULY 18, 2008

**PURPOSE:** Brief Bruce Boger and Jack Grobe on the status of the two options underway for the Oconee flood issue and the generic efforts

**OUTCOME:** Understanding of staff's current effort and provide guidance on path forward

**PROCESS:** Discuss both Oconee options and the generic efforts using the following bullets.

Agenda:

#### I. Introduction/Brief background for Bruce's effort (Mike Franovich)

- A. Option 1 - 50.54(f) letter
  - Questions whether Oconee adequately protects public health and safety from consequences of failure of Jocassee Dam
  - Cites plant licensing basis that states that Oconee was designed to withstand flooding conditions
  - States that Jocassee Dam Failure Inundation Study indicates flood height of 12.5 to 16.8 feet above grade, which is greater than 5-foot walls around SSF entrances

- Consensus staff opinion prefers this option
- B. Option 2 – Regulatory backfit analysis (cost-benefit analysis)
  - Indicates by PRA modifications up to \$13 million could be justified
  - Estimates preliminary cost of modifications (higher walls, water-proof doors, etc) \$3 million

## II. Status of Options

### A. Option 1 – 50.54(f) letter (Leonard Olshan)

- Letter with OGC. Expected date of concurrence ??.
- DORL Division Director, ADRO and ADES remain to concur.

### B. Option 2 – Regulatory backfit analysis (cost-benefit analysis) (Brian Richter)

- Provide certainty to cost estimates
- Expects analysis to be completed and initiates management reviews the week of July 21st

## III. Status of Generic Efforts

- Surveyed FSARs and IPEEEs of potentially affected plants to understand scope of issue; Drafted Information Notice (Kamal Manoly)
- Draft Communication Plan (Leonard Olshan)
- Backfit training projected in July 2008 (Leonard Olshan)