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Mitman, Jeffrey

From: Zoulis, Antonios *mlc*
Sent: Thursday, April 22, 2010 11:14 AM
To: Mitman, Jeffrey
Cc: Cunningham, Mark; Ferrante, Fernando; James, Lois; Galloway, Melanie
Subject: RE: Comments on the NRR Draft Memo: "Supplement to Tech Basis for Allowing ONS to Remain in Operation"

Jeff,

Your comments seem to indicate that the original memo was not appropriate and that Oconee should not have been allowed to continue to operate. My understanding is the second evaluation was conducted to determine the validity of the original memo. If you believe the original evaluation is invalid then Oconee **should not be allowed to continue to operate** and this second memo should document those reasons.

If you do not believe that, then I suggest the second memo re-affirm the first and allow the site to operate until November 2010 eliminating the extraneous information and lengthy discussion. Currently the memo is 3 pages long and regurgitates many of the same points with inappropriate twists. It would be more appropriate to simplify the second memo since re-hashing the details and word "smithing" is not productive and does not add any value to the Oconee evaluation.

Regards,
Antonios

From: Mitman, Jeffrey *mlc*
Sent: Thursday, April 22, 2010 10:58 AM
To: Galloway, Melanie
Cc: Cunningham, Mark; Ferrante, Fernando; James, Lois
Subject: RE: Comments on the NRR Draft Memo: "Supplement to Tech Basis for Allowing ONS to Remain in Operation"
Importance: High

Melanie, I don't have a copy of the memo at this point. I had only a hard copy and I gave that back to Meena. My answers are based on my notes and recollections.

In response to the first question: The memo does not quantify the risk increase, it simply makes this qualitative statement "... the staff's assessment to allow a slight increased risk until Duke's implementation schedule is in place ..." I don't know what the basis for this qualification is. My assessment is that the internal events CDF is about $1E-5$ per year and that the CCDF from a Jocassee Dam failure is about $2E-4$ per year. In my opinion this is not a "slight" contribution to the total risk per year.

Second: This new draft memo reaffirms the decision that was made back in 2008 (and documented in Memo ML090570117 from Cunningham, Hiland and Giitter to Evans, McCree and Boger dated August 12, 2009) allowing continued operation for two years through November 2010. This new draft memo does not extend the date beyond 11/2010.

To your final point: The basis for the new memo, and I assume the old, is twofold. The risk increase is acceptable and there is adequate defense in depth. Based on the criterion of LIC-504 the risk increase is acceptable. However, ONS has limited defense for core damage and containment failure given a dam failure which inundates the SSF. The limited defense is a single draft "mitigation strategy" written to prevent core damage which in my opinion will not work. This mitigation strategy does not address containment failure. This does not meet the basic principles of defense in depth quoted below from RG 1.174.

Thus the problem with the draft memo is not one of wording. The draft memo as written does not make the case to allow continued operations.

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Jeff Mitman

From RG 1.174: Consistency with the defense-in-depth philosophy is maintained if:

- A reasonable balance is preserved among prevention of core damage, prevention of containment failure, and consequence mitigation.
- Over-reliance on programmatic activities to compensate for weaknesses in plant design is avoided.
- System redundancy, independence, and diversity are preserved commensurate with the expected frequency, consequences of challenges to the system, and uncertainties (e.g., no risk outliers).
- Defenses against potential common cause failures are preserved, and the potential for the introduction of new common cause failure mechanisms is assessed.
- Independence of barriers is not degraded.
- Defenses against human errors are preserved.
- The intent of the General Design Criteria in Appendix A to 10 CFR Part 50 is maintained.

From: Galloway, Melanie *MG*

Sent: Thursday, April 22, 2010 9:42 AM

To: Mitman, Jeffrey; James, Lois

Cc: Cunningham, Mark; Ferrante, Fernando

Subject: RE: Comments on the NRR Draft Memo: "Supplement to Tech Basis for Allowing ONS to Remain in Operation"

Jeff,

In conversation with Mark this morning on this, he raised the question of whether your reference to the increased in core damage frequency was based on incremental risk (per year). And also whether the memo indicated a timeframe to which it would now apply. Your clarification of these points this morning would be appreciated.

Note that I did pass your summary comments onto Dave Skeen and note that you were working with Meena. He seemed to suggest that if issues were not presented correctly it would be a simple matter to change the wording (suggestions welcome) or delete it.

Melanie

From: Mitman, Jeffrey

Sent: Wednesday, April 21, 2010 6:14 PM

To: Galloway, Melanie; James, Lois

Cc: Cunningham, Mark; Khanna, Meena; Ferrante, Fernando

Subject: RE: Comments on the NRR Draft Memo: "Supplement to Tech Basis for Allowing ONS to Remain in Operation"

Melanie and Lois, I talked with Meena today about my concerns with the memo as written. She is planning to take these back to her management to discuss and will probably be setting up a discussion with DRA management. My comments are documented in the attached document.

Jeff

From: Galloway, Melanie

Sent: Tuesday, April 13, 2010 9:38 AM

To: Mitman, Jeffrey

Subject: RE: Comments on the NRR Draft Memo: "Supplement to Tech Basis for Allowing ONS to Remain in Operation"

Yes.

Mark and I also need further info on the Oconee Risk comparison. Mark was out yesterday, I didn't think what you provided yesterday fit the bill, I talked with him regarding what I thought he/we needed and have just

conveyed that to JCircle, who will convey to you. That's a task for today so hopefully you'll have time for the JCO also today or tomorrow.

From: Mitman, Jeffrey

Sent: Tuesday, April 13, 2010 9:27 AM

To: Galloway, Melanie

Subject: RE: Comments on the NRR Draft Memo: "Supplement to Tech Basis for Allowing ONS to Remain in Operation

Melanie, Meena is asking for input into the subject memo. Do I have permission to share with her my comments and work with her to resolve them?

Jeff