MEMORANDUM TO: Christopher I. Grimes, Chief

License Renewal and Standardization Branch Division of Regulatory Improvement Programs

FROM:

Joseph M. Sebrosky, Project Manager Original Signed By

License Renewal and Standardization Branch Division of Regulatory Improvement Programs

SUBJECT:

FORTHCOMING MEETING WITH DUKE ENERGY CORPORATION (DUKE) ON LICENSE RENEWAL FOR OCONEE NUCLEAR STATION.

UNITS 1, 2, AND 3

DATE & TIME:

Wednesday, August 18, 1999

4:00 p.m. - 5:00 p.m.

LOCATION:

Oconee Nuclear Station

7812 Rochester Hwy. (Hwy. 130/183),

Maintenance Training Facility, Room 140 South.

Seneca, SC 29672

PURPOSE:

The NRC staff will be at the Oconee site from August 16 through

August 18, 1999, to review material associated with the scoping process used for the license renewal application for Oconee Units 1, 2, and 3. Attached is background material and the agenda for the staff's review. A public meeting will be held at the end of the visit to discuss the staff's

observations.

PARTICIPANTS:*

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T. Quay, NRR

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R. Prato, NRR

C. Julian, NRC Region II

J. Sebrosky, NRR

et al.

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

Duke

L. Nicholson

E. Burchfield

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cc: w/attachment: See next page

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Corporation at 864-885-4309.

*Meetings between NRC technical staff and applicants or licensees are open for interested members of the public, intervenors, or other parties to attend as observers pursuant to "Commission Policy Statement on Staff Meetings Open to the Public" 59 Federal Register 48340, 9/20/94.

*See previous concurrence

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August 16 through 18, 1999, Audit Background

Purpose:

The purpose of the audit is to attempt to resolve Oconee Nuclear Station (ONS) safety evaluation report (SER) open item 2.1.3.1-1. An agenda is attached for the audit.

Background:

The staff issued the SER related to the license renewal of ONS Units 1, 2, and 3 on June 16, 1999. Section 2.1 of the SER discusses the staff's assessment of Duke's methodology for identifying structures and components subject to an aging management review. One aspect of the staff's review was the scoping process that Duke used to comply with the requirements of 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2). The NRC originally questioned aspects of Duke's scoping process in request for additional information (RAI) 2.2-6 that Duke responded to in a February 17, 1999, letter. A technical meeting was held on March 11, 1999, to further discuss the scoping issue. The meeting resulted in a revision to Duke's response to RAI 2.2-6 dated March 18, 1999, that provided an explanation of the scoping events set used for the license renewal mechanical scoping. Following the revision, the scoping issue remained open, leading to a May 11, 1999, management meeting to discuss the issue. In addition to the correspondence and meetings noted above, the NRC performed an inspection of Duke's scoping and screening process at Oconee from April 26 - 30, 1999. The inspection report 50-269/99-11, 50-270/99-11, and 50-287/99-11, dated May 24, 1999, also contains information related to this issue.

The May 11, 1999, management meeting resulted in action items that were carried forth as open item 2.1.3.1-1 in the SER. Specifically, the SER contains the following related to this open item:

- The applicant agreed to supplement its response to the staff's request for additional information (RAI) 2.2-6, to include a description of the process used to identify events for ONS license renewal scoping consistent with the presentation that was given to the staff. The applicant agreed to provide an explanation as to how the 26 events identified during the meeting are sufficient to satisfy 10 CFR 54.4(a)(1) and 54.4(a)(2). This is Open Item 2.1.3.1-1.
- Once the information identified in item 1 above is provided, the staff will determine
 whether additional inspection activities will be needed to verify that there is reasonable
 assurance that the Oconee systems, structures and components that are within scope of
 the license renewal rule have been captured by the applicant's process. This is part of
 open item 2.1.3.1-1.

By letter date. June 22, 1999, Duke responded to the first part of open item 2.1.3.1-1. The staff's prelimit ary assessment of Duke's response is that it resolves the first part of open item 2.1.3.1-1. (The staff will present its final conclusion on this part of the issue in an update to the SER).

In accordance with the second part of open item 2.1.3.1-1, the staff has determined that an additional audit is needed to resolve the issue. In the March 11, 1999, meeting Duke stated that there are 26 events that were considered scoping events that were used in the mechanical scoping area. Duke also stated that it reviewed an additional 32 events for possible inclusion into the set of scoping events. The staff's intention is to probe the additional 32 events that were considered for possible inclusion into the scoping events set.

Because the 26 scoping events that Duke used only considered those design-basis events identified in the Oconee updated final safety analysis report Chapter 15 and a limited number of other events, it is unclear as to whether all the design-basis events as required under 10 CFR 54.4(a)(1) and defined in 10 CFR 50.49(b)(1) have been identified. Furthermore, since the implementation of the applicant's scoping methodology may not have identified all the systems structures and components required in accordance with 10 CFR 54.4(a)(1), the potential exists for this concern to also affect the results of the scoping activities for the non-safety-related systems structures and components required under 10 CFR 54.4(a)(2).

The staff will review Duke's justification for the following events: pipe rupture, loss of decay heat removal, updated steam generator tube rupture analysis, loss of spent fuel pool cooling, loss of heating ventilation and air conditioning (HVAC) to the control room, and fuel handling accident. The first three events were identified during the April 26 - 30 inspection at the site. The fourth event, loss of spent fuel pool cooling, was also identified during the April 26 - 30 inspection and SER open item 2.2.3-1 is related to this issue. The fifth issue, loss of HVAC to the control room is related to SER open item 2.2.3.4.3.2.1-1. The staff identified the fuel handling accident because of concerns related to the cabling associated with the fuel handling bridges. Depending on the results of the review associated with the above 6 events the staff may expand its review.

In determining whether any of the events should have been considered the staff expects to use guidance associated with generic license renewal issue 98-0082 "Scoping Guidance." The staff expects that its position on the issue will be issued to the Nuclear Energy Institute prior to the audit.

Agenda for August 16 -19, 1999 Scoping Audit

<u>Time</u>	<u>Topic</u>
8/16 9:00 am through 8/17 12:00 pm	Review of material associated with the following events: pipe rupture, loss of decay heat removal, updated steam generator tube rupture analysis, loss of spent fuel pool cooling, loss of heating ventilation and air conditioning to the control room, and fuel handling accident.
8/17 1:30 pm	Entrance portion of the audit
8/17 1:45 pm	Duke presents overview of scoping process and process used to identify events for possible inclusion into the scoping events set.
8/17 2:30 pm	Staff presents overview of generic renewal position 98-0082 "Scoping Guidance"
8/17 3:00 pm	Begin discussion with Duke on the results of the staff's review of the above 6 events
8/18 8:00 am through 12:00 pm	Continue discussion with Duke on the results of the staff's review of the above 6 events
8/18 1:00 pm through 2:30 pm	NRC caucus on the results of the audit
8/18 2:30 pm through 4:00 pm	Discussion with Duke regarding the results of the audit
8/18 4:00 pm through 5:00 pm	Meeting with the public to discuss the staff's observations

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