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AUTH.NAME AUTHOR AFFILIATION
HAMPTON, J.W. Duke Power Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Documents why Oconee UFSAR contains evaluations of cask drops even though 970204 response to RAI states that cask drop accident is not credible, per 970501 telcon RAI.

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Duke Power Company
Oconee Nuclear Site
P.O. Box 1439
Seneca, SC 29679

J. W. HAMPTON
Vice President
(864)885-3499 Office
(864)885-3564 Fax



DUKE POWER

May 21, 1997

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Oconee Nuclear Station
Docket Numbers 50-269, -270 and 287
Bulletin 96-02, "Movement of Heavy Loads Over Spent
Fuel, Over Fuel in the Reactor Core, or Over Safety-
Related Equipment"; Request for Additional Information

References:

1. Letter from NRC to J.W. Hampton, Request for Additional Information Related to Bulletin 96-02, "Movement of Heavy Loads Over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment", December 6, 1996.
2. Letter from M.S. Tuckman to NRC, Response to Request for Additional Information; Bulletin 96-02, "Movement of Heavy Loads Over Spent Fuel Pool, Over Fuel in the Reactor Core, or Over Safety-Related Equipment", February 4, 1997.
3. Oconee Nuclear Station UFSAR Chapter 15.11, "Fuel Handling Accidents", 1995 Update.

On December 6, 1996, the NRC sent a Request for Additional Information (RAI) Related to Bulletin 96-02 (Ref. 1). Duke submitted its response to this RAI on February 4, 1997 (Ref. 2). This supplemental response to the NRC was requested during a phone conversation between Duke personnel and the NRC staff on May 1, 1997. This supplemental response documents why the Oconee UFSAR contains evaluations of cask drops (Ref. 3), even though Duke's response to the RAI states that a cask drop accident is not credible.

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May 21, 1997

Page 2

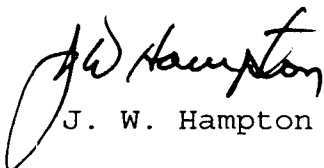
Since July, 1974, the issue of spent fuel pool cask drops at Oconee has been addressed between Duke and the NRC. Duke has always considered a cask drop or tip to be a very unlikely event. On August 29, 1975, the NRC asked Duke to either evaluate the consequences of a cask drop scenario, or demonstrate that the crane is a single-failure proof design per Branch Technical Position APCSB 9-1.

By letters dated November 3, 1975 and March 19, 1976, Duke provided an evaluation of the cask drop. The worst case cask drop is considered to be an eccentric drop on the spent fuel pool wall where the cask is deflected onto the spent fuel pool racks containing spent fuel assemblies. The NRC acknowledged that such an event is "extremely remote" in correspondence associated with License Amendments 32, 32, 29, dated September 10, 1976. However, the Oconee UFSAR has contained evaluations of the cask drop ever since. The initial cask drop evaluation performed in the UFSAR was a small shipping cask. As Oconee upgraded to the use of larger casks, the evaluations in the UFSAR were updated. The current set of cask drop evaluations in the UFSAR include a bounding analysis that was performed in support of the Oconee Independent Spent Fuel Storage Installation (ISFSI) and its associated cask movements using the NUHOMS-24P system's Transfer Cask.

In the December 6, 1996, request for additional information, the NRC asked Duke to evaluate the credibility of a cask drop or tip outside the spent fuel pool (Ref. 3). Duke has evaluated its crane design, load path, and cask loading and unloading processes and has determined that such an accident is not credible, notwithstanding the cask drop evaluations in the Oconee UFSAR. These UFSAR evaluations conservatively presupposed a cask drop event in the Oconee Spent Fuel Pool area and no evaluation was originally performed regarding the credibility of such an event.

As stated in Reference 2, it is the position of Duke Power that a cask drop or tip event is not credible at Oconee Nuclear Station.

Very truly yours,


J. W. Hampton

U. S. Nuclear Regulatory Commission

May 21, 1997

Page 3

xc: L. A. Reyes, Regional Administrator
U. S. Nuclear Regulatory Commission - Region II
61 Forsyth Street S.W.
Suite 23T85
Atlanta, GA 30303

M. A. Scott
Senior Resident Inspector
Oconee Nuclear Station

D. E. Labarge, Project Manager
U. S. Nuclear Regulatory Commission
Mail Stop O 14H25
Washington, D. C. 20555