

Public Meeting on Backfitting Led by CRGR

September 13, 2016

Chris Nolan, Director Regulatory Affairs

For Information Purposes Only



- NRC Inspectors apply current standards in their review of older plants
 - CDBI impact at ONS, RNP, BNP vs CNS, MNS, HNP
 - Older plants pre-date the SRP
 - Significant time spent focusing on licensing bases interpretation
 - CLB vs SRP
- Clarity vs Detail
- Compliance vs Safety
- Licensees are required to correct non-compliance
- This dynamic is inefficient
- This dynamic is a distraction from a focus on safety

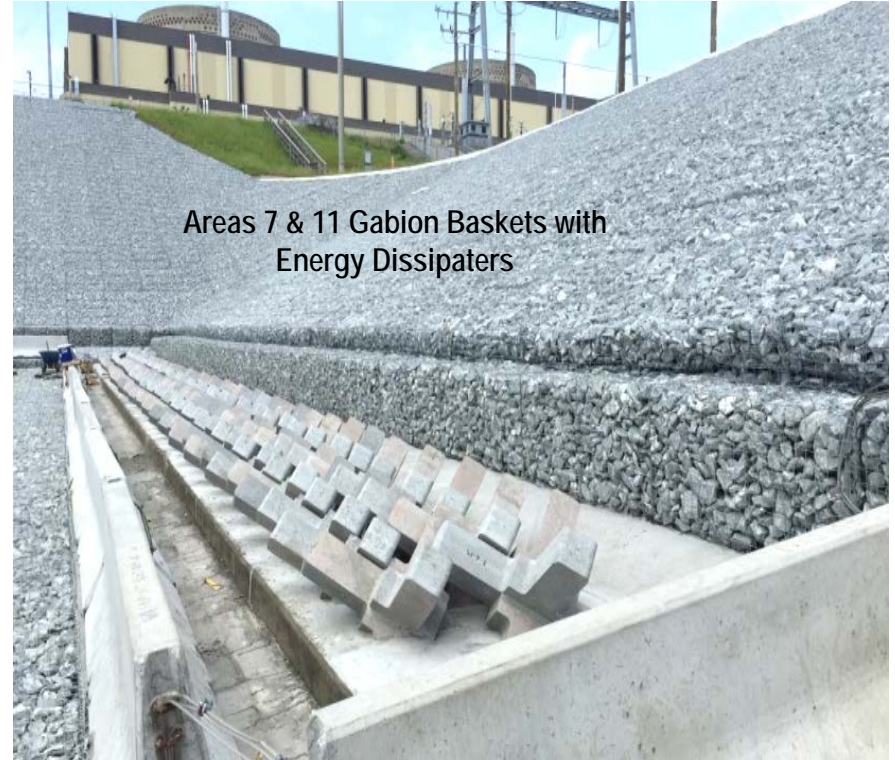
- **Oconee Cable Separation TIA:**
 - NRC first raised cable separation concern during PSW inspections in 2013
 - URI issued in 2014 CDBI Report, TIA request 2014
 - NRC raised some concerns including the locating of power and control cables in the same trench
 - Duke responded to TIA questions in May and August 2015 describing the Oconee licensing bases
 - Modifications to remove control power from the trench are complete
 - Duke implemented the use of armored cable to provide electrical separation at ONS/MNS/CNS
 - Cable Fault Testing conducted
 - Alternative submitted based on testing and modifications – February 2016
 - Draft TIA “fact check” submitted August 2016
- **Differences remain in the interpretation of the Oconee CLB**
- **Compliance vs Safety**
- **Independence in the staff review of Duke’s feedback**
- **TIA’s generally not reviewed by CRGR**

- Oconee External Flooding
 - Licensed as a Dry Site (1973)
 - Postulated PRA Jocassee Dam failure reviewed by NRC (1985)
 - White Finding on SSF flood barrier penetration (2006)
 - NRC raised questions on dam frequency failures and 50.54(f) request (2008)
 - Deterministic analysis completed on dam failure (2010)
 - CAL 2-10-003 issued and compensatory measures taken (2010)
 - NRC Safety Evaluation issued (2011)
 - NRC Fukushima 50.54(f) (2012)
 - Modifications initiated to enhance the plant's response to flooding (2013)
 - Revised Flood Hazard Reevaluation Report (FHRR) (2015)
 - Modifications completed / CAL Inspection Closure (2016)
 - Defense-in-depth flood response strategy: physical protection barriers and mitigation strategies
 - Issue resolved: Original licensing basis unchanged, new beyond design basis event

Back-up Power Path, Discharge Diversion Wall & Turbine Drain Isolation Completed



Scour Protection – Completed



- Compliance is important
- The focus should be on Safety
- Low Risk/Compliance Initiative
- Inspection Oversight Opportunities
 - CLB vs SRP
- Independence in the review of licensee challenges of inspection issues
- Not all issues involving backfit go to CRGR
- Plant specific issues can have generic implications
- A clear and transparent process is key to the path forward