

October 29, 1999

NOTE TO: Public Document Room, LL-6 PUBLIC DOCUMENT ROOM
FROM: Joseph M. Sebrosky, Project Manager 100 NOV 2 11:11
License Renewal and Standardization Branch, NRR
SUBJECT: ADVANCE COPY OF THE LICENSE RENEWAL MEETING
HANDOUTS

Attached is an advanced copy of the handouts for the meeting described below. We have committed to place this material in the Public Document Room promptly because of public interest in license renewal. When the formal summary of this meeting is completed, we will note on the distribution that the meeting handouts have been previously sent to the PDR. Should you have any questions regarding this material, please contact me at 304-415-1132 or E-mail JMS3.

cc w/o attachments:
RLSB R/F

Meeting Date: October 28, 1999

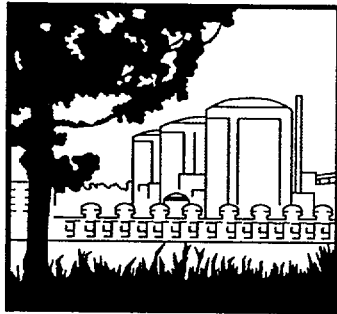
Subject: SUMMARY OF OCTOBER 28, 1999, MEETING WITH DUKE TO
DISCUSS SCOPING PROCESS USED FOR THE OCONEE LICENSE
RENEWAL APPLICATION

Docket No(s): 50-269, 50-270, and 50-287
50-317, 50-318

D Fol



Oconee License Renewal Project



Duke/NRC Management Meeting

Discussion of the Plan for Resolution of Scoping Methodology Issue

October 28, 1999



Purpose of Meeting

- Discuss information needs described in the enclosure to the 10/8/99 NRC letter concerning issues involving the Oconee License Renewal Scoping Methodology
- Clarify management expectations for issue resolution by discussing examples associated with the ten events identified by the NRC in the enclosure
- Define management expectations on how to focus efforts to resolve the issue

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Scoping Methodology Discussion

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Chronology of Issue

- 10/27/98 NRC staff technical visit to Duke to review scoping details (NRC trip report issued 2/8/99)
- 12/1/99 Request for Additional Information (RAI) 2.2-6 issued addressing scoping topic (NRC letter dated 12/1/99)
- 2/17/99 Duke submits initial response to RAI 2.2-6 (M.S. Tuckman letter dated 2/17/99)
- 3/11/99 Duke technical meeting with NRC staff (NRC meeting summary issued 4/2/99)
- 3/18/99 Duke submits revised response to RAI 2.2-6 (M.S. Tuckman letter dated 3/18/99)
- 5/11/99 Duke/NRC management meeting focused on scoping issue (NRC meeting summary issued 5/19/99)

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Chronology of Issue

- 6/16/99 NRC Safety Evaluation Report related to Oconee license renewal issued with open item 2.1.3.1-1
- 6/22/99 Duke submits initial response to SER open item 2.1.3.1-1 (M.S. Tuckman letter dated 6/22/99)
- 8/16-18/99 NRC staff meets with Oconee staff to review materials associated with the scoping process (NRC meeting summary issued 8/27/99)
- 8/27/99 Duke management presents further scoping issue information at monthly NRC/Duke license renewal management meeting (NRC meeting summary issued 9/7/99)
- 10/8/99 NRC issues Plan for the Resolution of the Scoping Issue (NRC letter dated 10/8/99)

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Seven Features of the License Renewal Scoping Methodology

1. Functional flow path identification

All mechanical systems and their functions that are listed in Oconee event mitigation calculations are included within the scope of license renewal. (The scope of these events is the subject of SER Open Item 2.1.3.1-1.)

2. Fluid pressure boundary determination

All passive pressure boundaries required for mechanical systems identified in Feature 1 above are included within the scope of license renewal.

3. Physical interference identification

Portions of selected mechanical systems whose failure to maintain their pressure boundary or to remain structurally intact would result in impacting the function of any essential system and component (seismic II/I) are included within the scope of license renewal.

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Seven Features of the License Renewal Scoping Methodology

4. Other designated item identification (safety-related, seismic)

Mechanical systems or portions of systems that contain safety-related and seismically designed piping that have not otherwise been included are included within the scope of license renewal.

5. All Oconee structures that are designated as either Class 1 or 2 as defined in UFSAR

6. All Oconee electrical components are initially assumed to be within scope

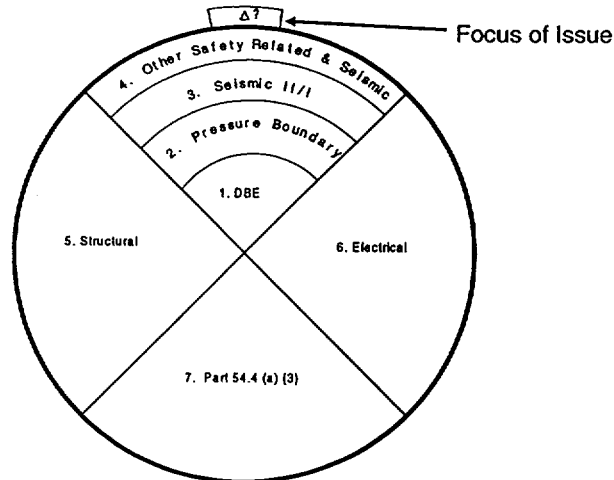
7. All structures and mechanical systems required for events identified in §54.4(a)(3)

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License Renewal Scoping Methodology



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Issue Description

- **Issue:** Is the set of events that is considered by the Oconee License Renewal Scoping Methodology sufficient for scoping?
- **NRC Perspective:** "The staff believes that more events should be reviewed to determine if they would identify any SSC functions that might be considered necessary to ensure the functions identified in 10 CFR 54.4(a)(1)." ...from the 10/8/99 NRC letter
- **Duke Response:** Review applicable CLB information for the ten events identified in the enclosure to the 10/8/99 letter to assess if there are specific plant capabilities relied on for these ten events in the licensing basis

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Ten Events

1. High Energy Line Break
2. Loss of Decay Heat Removal
3. Loss of Spent Fuel Pool Cooling – Heat Transfer function
4. Loss of Control Room
5. Steam Generator Overfill
6. Steam Generator Dryout
7. Loss of Instrument Air
8. Internal Flooding (Auxiliary Building)
9. Control of Heavy Loads
10. Loss of Condensate

Applicable CLB Information

- CLB documents being reviewed
 - UFSAR
 - License Conditions
 - Commission Orders
 - Commission Regulations
 - Exemptions

Initial Perspective

- From initial review, several groups of findings have appeared
 - Some events are not described in the applicable CLB information
 - Some events appear to credit solely plant hardware that is already within the scope of license renewal.
 - Some events appear to credit only operator action and mention of non-specific hardware
 - Some events appear to credit other hardware in addition to that already within the scope of license renewal
- The following examples illustrate several of these groups

Example of events not described in the applicable CLB information

- **Control of Heavy Loads**
 - From review to date, this event does not appear to be discussed in the applicable CLB documents



***Example of events crediting solely
plant hardware that is already within
the scope of license renewal.***

■ **Steam Generator Dryout**

- This event is discussed in the applicable CLB documents
- The credited hardware is an electrical system that senses low steam generator water level and sends a signal to initiate Emergency Feedwater, if not already initiated by other signals
- This instrumentation was included in the Electrical scoping portion of the Oconee License Renewal Scoping Methodology

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***Example of events crediting only
operator action and/or mention of non-
specific hardware***

■ **Loss of Spent Fuel Pool Cooling - Heat Transfer**

- Loss of Spent Fuel Pool Cooling is discussed in the applicable CLB documents
- During normal operation, pool heat removal is performed by the Spent Fuel Pool Cooling System which, in turn, is cooled by the non-safety-related Recirculating Cooling Water System
- In the event of the loss of spent fuel pool cooling, the applicable CLB documents credit only operator actions and non-specific sources of water to restore pool inventory, to keep the fuel covered and to preclude Part 100 releases
- Heat transfer from the pool is not a requirement

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Example of events crediting other hardware in addition to that already within the scope of license renewal

■ **Loss of Decay Heat Removal**

- This event is discussed in the applicable CLB documents
- In response to GL 88-17, Loss of Decay Heat Removal, a number of administrative and programmatic actions were implemented at Oconee
- One of these actions was to implement several commitments to further reduce the risk of loss of decay heat removal

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Example of events crediting other hardware in addition to that already within the scope of license renewal

■ **Loss of Decay Heat Removal (continued)**

- From Oconee UFSAR Chapter 16, SLC 16.5.3, Item g reads:
 - g. Two of the following means of adding inventory to the RCS are available and operable:
 1. A gravity flow path from the BWST
 2. One Bleed Transfer Pump (BTP) and connecting piping
 3. A High Pressure Injection (HPI) pump
- Operators have discretion as which two of the three means to add inventory to the RCS

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Example of events crediting other hardware in addition to that already within the scope of license renewal

■ **Loss of Decay Heat Removal (continued)**

- The gravity flow path from the BWST and the HPI pump are safety-related and have been identified by the Oconee License Renewal Scoping Methodology
- The non-safety-related Bleed Transfer Pump (BTP) and connecting piping were not identified by the Oconee License Renewal Scoping Methodology

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Example of events crediting other hardware in addition to that already within the scope of license renewal

■ **Loss of Control Room**

- This event is discussed in the applicable CLB documents
- In the event of loss of Control Room, two means are installed to maintain the plant in safe shutdown from outside the Control Room - the Standby Shutdown Facility (SSF) and the Auxiliary Shutdown Panel
- No apparent requirement to have two means

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Example of events crediting other hardware in addition to that already within the scope of license renewal

■ **Loss of Control Room (continued)**

- The safety-related SSF was installed in part to mitigate the consequences of fire in the Control Room and is in the scope of license renewal
- The original, non-safety related ASP is not electrically isolated from the Control Room and so was replaced by the SSF for most uses. The ASP can be used at the discretion of the operator depending on the nature of the event
- The Auxiliary Shutdown Panel was not identified by the Oconee License Renewal Scoping Methodology

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Proposed Expectations

- To complete a timely review and to capture the results, clear management expectations are needed to focus efforts to resolve the issue
- Proposal to set limits on the depth of the review.
 - If an event is not mentioned in the applicable CLB information, then state as such and conclude review.
 - If an event description includes only operator procedural and/or non-specific plant hardware references, then state as such and conclude review.
 - If an event description includes specific hardware references, then only identify the hardware not previously identified in the Oconee Application and conclude review.

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- *Discussion and Clarification of Management Expectations*

- *Document expectations and capture in meeting summary*

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