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10 CFR 50.4

February 28, 2013

U. S. Nuclear Regulatory Commission  
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Rockville, MD 20852

**SUBJECT:** Duke Energy Carolinas, LLC (Duke Energy)  
Catawba Nuclear Station (CNS), Units 1 and 2  
Docket Nos. 50-413 and 50-414  
Renewed License Nos. NPF-35 and NPF-52  
McGuire Nuclear Station (MNS), Units 1 and 2  
Docket Nos. 50-369 and 50-370  
Renewed License Nos. NPF-9 and NPF-17  
Oconee Nuclear Station (ONS), Units 1, 2, and 3  
Docket Nos. 50-269, 50-270, and 50-287  
Renewed License Nos. DPR-38, DPR-47, and DPR-55  
Overall Integrated Plans in Response to March 12, 2012, Commission Order  
Modifying Licenses With Regard to Requirements for Reliable Spent Fuel Pool  
Instrumentation (Order Number EA-12-051)

**REFERENCE:**

1. NRC Letter, E.J. Leeds (NRC) to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred status, *Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation EA-12-051*, dated March 12, 2012, Accession No. ML12054A679
2. NRC Japan Lessons-Learned Project Directorate, JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, Revision 0*, dated August 29, 2012, Accession No. ML12221A339
3. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1*, dated August 2012. Accession No. ML12240A307

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an Order (i.e., Reference 1) to Duke Energy. Reference 1 was immediately effective and directs Duke Energy to have a reliable indication of the water level in associated spent fuel pools (SFP).

The Order requires submission of an overall integrated plan, including a description of how compliance with the requirements described in Reference 1 will be achieved, to the NRC for review by February 28, 2013. This letter fulfills that requirement; specific details of the plan are outlined in the following attachments:

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- Attachment 1: Catawba Nuclear Station, Units 1 and 2
- Attachment 2: McGuire Nuclear Station, Units 1 and 2
- Attachment 3: Oconee Nuclear Station, Units 1, 2, and 3

The attached integrated plans reflect the current design information as of the writing of this letter, much of which is still preliminary, pending completion of on-going evaluations and analyses. As further design details and associated procedure guidance are finalized, supplemental information will be communicated to the Staff in the 6-month status reports required by Reference 1.

Duke Energy has identified no known impediments to compliance with the Order by the specified implementation due date (i.e., within two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever is earlier). The implementation due dates of the Order for the listed units are indicated below.

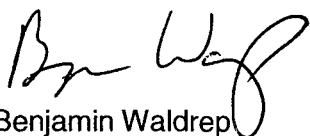
Unit	Prior to Startup from Refueling Outage
Catawba Nuclear Station, Units 1	1EOC22 (Fall 2015)
Catawba Nuclear Station, Units 2	2EOC20 (Spring 2015)
McGuire Nuclear Station, Units 1	M1EOC23 (Fall 2014)
McGuire Nuclear Station, Units 2	M2EOC23 (Fall 2015)
Oconee Nuclear Station, Units 1	O1EOC29 (Fall 2016)
Oconee Nuclear Station, Units 2	O2EOC27 (Fall 2015)
Oconee Nuclear Station, Units 3	O3EOC28 (Spring 2016)

This letter contains no new regulatory commitments.

If you have any questions or require additional information, please contact Donna Alexander, Manager - Nuclear Regulatory Affairs, at (919) 546-5357.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on February 28, 2013.

Sincerely,



Benjamin Waldrep  
Vice President - Corporate Governance &  
Operations Support

Attachments:

1. Overall Integrated Plan: Catawba Nuclear Station (CNS), Units 1 and 2
2. Overall Integrated Plan: McGuire Nuclear Station (MNS), Units 1 and 2
3. Overall Integrated Plan: Oconee Nuclear Station (ONS), Units 1, 2, and 3

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**ATTACHMENT 1**

**OVERALL INTEGRATED PLAN:**

**CATAWBA NUCLEAR STATION (CNS), UNITS 1 AND 2**

**DOCKET NOS. 50-413 AND 50-414**

**RENEWED LICENSE NOS. NPF-35 AND NPF-52**

## Overall Integrated Plan: Catawba Nuclear Station (CNS), Units 1 and 2

### Applicability:

This integrated plan applies to Catawba Nuclear Station (CNS) Units 1 and 2. CNS has separate spent fuel storage pools for each unit. CNS is planning to have reliable indication of the water level in the Unit 1 & 2 spent fuel storage pools, capable of continuously monitoring water levels over a range equal to or greater than required by the NRC Order EA-12-051.

### Schedule:

In accordance with Order EA-12-051 (Order), the installation of reliable spent fuel pool (SFP) level instrumentation is planned to be completed as follows:

- Unit 1 prior to startup from the 1EOC22 refueling outage (fall 2015)
- Unit 2 prior to startup from the 2EOC20 refueling outage (spring 2015)

### Identification of Spent Fuel Pool Water Levels:

Indication of SFP level will be provided from approximately normal pool water level (El. 598'-6") down to approximately the top of irradiated fuel assemblies seated in the storage racks (El. 573'). In particular, the system will be capable of continuously monitoring SFP level at three distinct water levels described in the Order.

- Level 1 - Level that is adequate to support operation of the normal fuel pool cooling system - indicated level on either channel greater than the point at which pump suction is presumed to be lost (El. 597' - 4").
- Level 2 - Level adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck - indicated level on either channel greater than 10' above the highest point of any fuel racks, or > El. 583'. This monitoring level ensures there is adequate water level to provide substantial radiation shielding for personnel responding to beyond-design-basis external events and to initiate SFP makeup strategies.
- Level 3 - Level where fuel remains covered but actions to implement make-up water addition should no longer be deferred - Indicated level on either channel less than 12 inches above the highest point of any fuel storage rack. This monitoring level ensures there is adequate water level above the stored fuel seated in the storage racks.

### Instruments:

Design of the new instrumentation for each CNS SFP will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

### Reliability:

Reliability of the instrument channels will be assured by conformance with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02, as described below:

## **Overall Integrated Plan: Catawba Nuclear Station (CNS), Units 1 and 2**

### **Instrument Channel Design Criteria:**

The instrumentation will consist of two diverse, permanent, fixed instrument channels to monitor SFP water level continuously, from approximately normal level down to approximately the top of the fuel storage racks. Level monitoring can be performed under conditions that could restrict personnel access to the pool, such as structural damage, high radiation levels, or heat and humidity from a boiling pool. Because both channels will be permanent, they are considered redundant, and neither is designated as "primary" or backup".

### **Arrangement:**

The two SFP level instrument channels will be installed in spatially separated locations and arranged in a manner to reduce the potential for common damage to both channels. Each channel will be installed within or adjacent to the Spent Fuel Buildings on Unit 1 & 2, which are Category I structures capable of withstanding missiles and other external events.

### **Mounting:**

Each permanently installed instrument channel will be mounted to retain design configuration during and following the maximum seismic ground motion considered in the design of the spent fuel pool structure.

### **Qualification:**

Both instrument channels for each pool will be specified to be reliable at the maximum temperature, humidity, and radiation levels predicted during an extended loss of AC power (ELAP) event at their installed locations. The level instrumentation is to be designed to remain functional following a Safe Shutdown Earthquake.

The instrumentation reliability will be demonstrated by appropriate combination of design, analysis, operating experience and/or testing as outlined by NEI 12-02.

This reliability will be established through vendor qualification documents procured under an augmented quality assurance process defined by Duke Energy.

### **Independence:**

The two SFP level instrument channels for each pool will be physically and electrically independent of one another. The associated cabling, power supplies and indication for each level instrument channel will be routed separately from each other.

### **Power Supplies:**

The two instrumentation channels for each unit will be powered normally by separate power supplies backed up by rechargeable or replaceable batteries. The backup power sources will have sufficient capacity to maintain the level indication function until offsite power or other emergency resource availability is reasonably assured.

## **Overall Integrated Plan: Catawba Nuclear Station (CNS), Units 1 and 2**

### **Accuracy**

The instrument accuracy will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02. The new SFP level instrumentation will be designed to maintain their design accuracy without recalibration following a power interruption or change in power source. Additionally, instrument accuracy will be designed to allow trained personnel to determine when the actual level exceeds the specified lower level of each indicating range (water levels 1, 2, 3 as identified by NEI 12-02 guidance) without conflicting or ambiguous indication.

### **Testing:**

The instrument channel design shall provide for routine testing and calibration. Testing will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02. The standard CNS processes for scheduling and implementing testing and calibration will ensure that the SFP level instruments are maintained by trained technicians using approved test procedures.

### **Display:**

The instrument displays for both channels on each unit are to be located in the main control room or other accessible location. The displays will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

### **Instrument Channel Program Criteria:**

The program criteria will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

### *Training*

Personnel shall be trained in the use and the provision of alternate power to each instrument channel.

Station personnel performing functions associated with the SFP level instrumentation will be trained to perform the job specific functions necessary for their assigned tasks. The Systematic Approach to Training (SAT) will be used to identify the population to be trained and to determine both the initial and continuing elements of the required training.

### *Procedures*

Procedures will be developed using guidelines and vendor instructions to address the maintenance, operation and abnormal response issues associated with the SFP level instrumentation.

Procedures will also address strategy to ensure SFP water addition is initiated at an appropriate time consistent with implementation of NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide.



**Overall Integrated Plan: Catawba Nuclear Station (CNS), Units 1 and 2**

*Testing and Calibration*

Testing and calibration of the instrumentation will be consistent with vendor recommendations or other documented basis. Calibration will be specific to the mounted instrument(s) and the display(s). Existing station work control processes will be utilized to control maintenance and testing.

**Need for Relief and Basis:**

Catawba Nuclear Station is not requesting relief from the requirements of Order EA-12-051 or the guidance in NRC JLD-ISG-2012-03 and NEI 12-02 at this time.

**ATTACHMENT 2**

**OVERALL INTEGRATED PLAN:**

**MCGUIRE NUCLEAR STATION (MNS), UNITS 1 AND 2**

**DOCKET NOS. 50-369 AND 50-370**

**RENEWED LICENSE NOS. NPF-9 AND NPF-17**

## **Overall Integrated Plan: McGuire Nuclear Station (MNS), Units 1 and 2**

### **Applicability:**

This integrated plan applies to McGuire Nuclear Station (MNS) Units 1 and 2 (Docket Nos. 50-369 and 50-370). MNS has separate spent fuel storage pools for each unit. MNS plans to install reliable wide range level indication for the Unit 1 and 2 spent fuel storage pools, capable of continuously monitoring water levels over a range equal to or greater than required by the NRC Order EA-12-051.

### **Schedule:**

In accordance with NRC Order EA-12-051, the installation of reliable spent fuel pool (SFP) level instrumentation is planned to be completed as follows:

- Unit 1 prior to startup from the 1EOC23 (fall 2014)
- Unit 2 prior to startup from the 2EOC23 (fall 2015)

### **Identification of Spent Fuel Pool Water Levels:**

Indication of SFP level will be provided to monitor normal levels (~ 771' Elev.) down to the top of the highest point of any fuel rack seated in the SFP. The level instrumentation will provide the capability to monitor SFP level at the three distinct critical levels identified by NEI 12-02 guidance:

- Level 1 – Level adequate to support operation of the normal fuel pool cooling system. The minimum required level to provide adequate pump suction (769' Elevation).
- Level 2 - Level adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck 756' (10±1 feet above the top of the highest point of any fuel rack seated in the SFP). This level provides substantial personnel radiation shielding that would allow implementation of local SFP make-up strategies for a beyond design bases event.
- Level 3 – Level where fuel remains covered and actions to implement make-up water addition should no longer be deferred (approximately 746' ±1 foot the highest point of any fuel rack seated in the SFP).

### **Instruments:**

The design of the MNS SFP level instrumentation will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02. Final specification of instrumentation technology for this application has not been finalized, and will be communicated in subsequent submittal updates.

The SFP level instrumentation will consist of two permanently installed instruments for each SFP, which will provide continuous SFP level indication. Each level channel/instrument is spatially and electrically separated from the other channel/instrument. The level instrumentation will allow remote monitoring capability, whereby level monitoring can be performed under

## **Overall Integrated Plan: McGuire Nuclear Station (MNS), Units 1 and 2**

conditions that could restrict personnel access to the pool, such as structural damage, high radiation levels, or heat and humidity from a boiling pool.

The remote level indication range will be specified to support monitoring SFP levels above the minimum allowed Technical Specification 3.7.13, "Spent Fuel Pool Water Level," (e.g. ~769' Elevation or  $\geq 23$  ft over the top of irradiated fuel assemblies seated in the storage racks), and the top of the fuel storage racks at 746' Elev. At least one of the instrument channels will provide remote control room indication.

### **Reliability:**

Reliability of the level instrumentation will be assured by conformance with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02, as described below.

### **Instrument Design Criteria:**

Instrumentation design criteria will be consistent with the guidance in NRC JLD-ISG-2012-03 and NEI 12-02.

### ***Arrangement:***

In accordance with the guidance in NEI 12-02, the level instruments/channels will be installed in diverse locations and physically arranged in a manner that provides reasonable protection of the level indication function against missiles that may result from damage to the structure over the SFP.

The associated cabling, power supplies and indication each level instrument/channel will be routed separately from each other. Cable routings will be specified to provide reasonable protection from missiles that may result from damage to the structure over the SFP and refuel floor, as applicable. The conduit and cable routing will be determined by the detailed design.

### ***Mounting:***

Permanently installed instruments will be mounted to retain the component design configuration during and following the maximum seismic ground motion considered in the design SFP structure or applicable structure in which the component is located.

If applicable, adjacent hardware stored in the SFP will be evaluated to ensure it cannot adversely interact with SFP level instrumentation.

### ***Qualification:***

The level instrumentation shall remain functional and maintain required accuracy capability after a Safe shutdown Earthquake, and/or after exposure to any applicable harsh environmental conditions for the equipment location. The level instrumentation and associated cabling will be specified to be reliable at the maximum temperature, humidity, and radiation levels predicted during an extended loss of AC power (ELAP) event at their installed locations.

### **Overall Integrated Plan: McGuire Nuclear Station (MNS), Units 1 and 2**

The instrumentation reliability will be demonstrated by appropriate combination of design, analyses, operating experience, and/or testing as outlined by NEI 12-02.

Augmented Quality provisions will be applied to ensure the rigor of the qualification documentation reviews and in-plant modification installation oversight is sufficient to ensure compliance with the qualification requirements above. This approach to quality assurance is consistent with the guidance in NRC JLD-ISG-2012-03 and NEI 12-02.

#### ***Independence:***

The level instruments and any associated cabling (for each Unit SFP) will be physically separated and electrically independent of one another.

#### ***Power Supplies:***

Power supplies (if required) for each SFP instrument/channel shall be electrically separate. If powered, the level instrumentation shall have provisions for emergency back-up power source such as batteries, which are rechargeable or replaceable. The back-up power source(s) must have sufficient capacity to maintain the level indication function until offsite power or other offsite emergency resources provided by FLEX procedures becomes available, consistent with the guidance of NEI 12-02.

#### ***Accuracy:***

The new SFP level instrumentation will be designed to maintain their design accuracy without recalibration following a power interruption or change in power source.

Accuracy will consider SFP post-event conditions, e.g., saturated water, steam environment, or concentrated boric acid water, or applicable limiting environmental conditions for the installed location.

Instrument accuracy will be suitable to allow trained personnel to determine when the actual level exceeds the specified lower level of each indicating range (critical levels 1, 2, 3 as identified by NEI 12-02 guidance) without conflicting or ambiguous indication.

#### ***Testing:***

The instrument channel design shall provide for routine testing and calibration. Testing will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

#### ***Display:***

The instrument displays for each SFP level instrument will be provided in the main control room or other accessible location. The displays will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

## **Overall Integrated Plan: McGuire Nuclear Station (MNS), Units 1 and 2**

### **Program Features:**

The SFP level instrumentation program criteria will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

### ***Training:***

The Systematic Approach to Training (SAT) will be used to identify the population to be trained and to determine both the initial and continuing elements of the required training. Training will be completed prior to placing the instrumentation in service.

Station personnel performing functions associated with the SFP level instrumentation will be trained to perform the job specific functions necessary for their assigned tasks.

### ***Procedures:***

Station procedures will be developed using guidelines and vendor instructions to address the maintenance, operation and abnormal response issues associated with the SFP level instrumentation.

Procedures will be developed to address strategy to ensure SFP water addition is initiated at an appropriate time consistent with implementation of NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide.

### ***Testing and Calibration:***

Testing and calibration of the instrumentation will be consistent with vendor recommendations or other documented basis. Calibration will be specific to the mounted instrument(s) and the display(s).

Station procedures and preventive maintenance will be developed to perform required instrumentation maintenance, testing, periodic calibrations, and/or functional checks.

Existing station work control processes will be utilized to control maintenance and testing.

### **Need for Relief and Basis:**

MNS is not requesting relief from the requirements of Order EA-12-051 or the guidance in NRC JLD-ISG-2012-03 and NEI 12-02 at this time.

**ATTACHMENT 3**

**OVERALL INTEGRATED PLAN:**

**OCONEE NUCLEAR STATION (ONS), UNITS 1, 2, AND 3**

**DOCKET NOS. 50-269, 50-270, AND 50-287**

**RENEWED LICENSE NOS. DPR-38, DPR-47, AND DPR-55**

## **Overall Integrated Plan: Oconee Nuclear Station (ONS), Units 1, 2, and 3**

### **Applicability:**

This integrated plan applies to Oconee Nuclear Station (ONS) Units 1, 2, and 3 (Docket Nos. 50-269, 50-270 and 50-287). ONS has two spent fuel storage pools, one shared by Units 1 & 2 and one for Unit 3. There are no gates or divisions that could create different levels within the shared Unit 1 & 2 pool. ONS plans to install reliable level indication for the Unit 1 & 2 and Unit 3 spent fuel storage pools, capable of continuously monitoring water levels over a range equal to or greater than required by the NRC Order EA-12-051. Instrumentation currently installed to monitor spent fuel pool (SFP) level during normal operating conditions will not be affected.

### **Schedule:**

In accordance with the order, the installation of reliable spent fuel pool (SFP) level instrumentation is planned to be completed as follows:

- Unit 1/2 prior to startup from the 2EOC27 refueling outage (fall 2015)
- Unit 3 prior to startup from 3EOC28 refueling outage (spring 2016)

### **Identification of Spent Fuel Pool Water Levels:**

Indication of SFP level will be provided from one foot above normal pool water level (El. 841'-0") down to approximately the top of the fuel storage racks (El. 816'-6" for Unit 1 & 2 and El. 816'-4" for Unit 3).

In accordance with the guidance in NEI 12-02, the system will be capable of monitoring SFP level at three distinct water levels:

- Level 1 - Level that is adequate to support operation of the normal fuel pool cooling system - indicated level greater than the point at which pump suction is presumed to be lost (El. 837'-6").
- Level 2 - Level adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck - indicated level greater than 10' above the highest point of any fuel storage racks (approximately El. 826'-6" for Units 1 & 2 and El. 826'-4" for Unit 3).
- Level 3 - Level where fuel remains covered but actions to implement make-up water addition should no longer be deferred - indicated level at the highest point of any fuel storage racks (approximately El. 816'-6" for Units 1 & 2 and El. 816'-4" for Unit 3).

### **Instruments:**

Design of the new instrumentation for each ONS SFP will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02. Selection of the instrument technology to be used in this application has not been finalized and will be communicated in subsequent submittal updates.



## **Overall Integrated Plan: Oconee Nuclear Station (ONS), Units 1, 2, and 3**

### **Reliability:**

Reliability of the instrument channels will be assured by conformance with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02, as described below:

### **Instrument Channel Design Criteria:**

The instrumentation will consist of two diverse, permanent, fixed instrument channels to monitor SFP water level continuously, from one foot above normal level down to approximately the top of the fuel storage racks. Each level channel/instrument will be spatially and electrically separated from the other channel/instrument. The level instrumentation will allow remote monitoring capability, whereby level monitoring can be performed under conditions that could restrict personnel access to the pool, such as structural damage, high radiation levels, or heat and humidity from a boiling pool. Because both channels will be permanent, they are considered redundant, and neither is designated as "primary" or "backup".

### **Arrangement:**

The two SFP level instrument channels will be installed in diverse locations, arranged in a manner that provides reasonable protection of the level indication function against missiles that may result from damage to the structure over the SFP.

The associated cabling, power supplies and indication for each level instrument/channel will be routed separately from each other. Cable routings will be specified to provide reasonable protection from missiles that may result from damage to the structure over the SFP and refuel floor, as applicable. The conduit and cable routing will be determined by the detailed design.

### **Mounting:**

Permanently installed instruments will be mounted to retain their design configuration during and following the maximum seismic ground motion considered in the design of the SFP structure or other building structure in which they are located.

### **Qualification:**

All instrument channels will be specified to be reliable at the maximum temperature, humidity, and radiation levels predicted during an extended loss of AC power (ELAP) event at their installed locations. The level instrumentation will be designed to remain functional following a Safe Shutdown Earthquake.

The instrumentation reliability will be demonstrated by appropriate combination of design, analyses, operating experience, and/or testing as outlined by NEI 12-02.

This reliability will be established through use of vendor qualification documents procured under an augmented quality assurance process defined by Duke Energy.

## **Overall Integrated Plan: Oconee Nuclear Station (ONS), Units 1, 2, and 3**

### **Independence:**

The two level instruments and associated cabling for each SFP will be physically separated and electrically independent of one another.

### **Power Supplies:**

The two instrument channels for each SFP will be powered normally by separate power supplies backed up by rechargeable or replaceable batteries. The backup power sources will have sufficient capacity to maintain the level indication function until offsite power or other emergency resource availability is reasonably assured consistent with NEI 12-02 guidance.

### **Accuracy:**

The accuracy will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02. The new SFP instrument channels will be capable of maintaining their designed accuracy without recalibration following a power interruption or change in power source.

Accuracy will consider SFP post-event conditions, e.g., saturated water, steam environment, or concentrated borated water.

Instrument accuracy will be sufficient to allow trained personnel to determine when the actual level exceeds the specified lower level of each indicating range (levels 1, 2 and 3 as identified by NEI 12-02 guidance) without conflicting or ambiguous indication.

### **Testing:**

The instrument channel design shall provide for routine testing and calibration. Testing will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

### **Display:**

The instrument displays for each SFP level instrument will be provided in the main control room or other accessible location. The displays will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

### **Program Features:**

The program criteria will be consistent with the guidelines of NRC JLD-ISG-2012-03 and NEI 12-02.

### *Training*

Personnel shall be trained in the use and the provision of alternate power to each instrument channel.

Station personnel performing functions associated with the SFP level instrumentation will be trained to perform the job specific functions necessary for their assigned tasks. The Systematic

**Overall Integrated Plan: Oconee Nuclear Station (ONS), Units 1, 2, and 3**

Approach to Training (SAT) will be used to identify the population to be trained and to determine both the initial and continuing elements of the required training. Training will be completed prior to placing the instrumentation in service.

*Procedures*

Procedures will be developed using guidelines and vendor instructions to address the maintenance, operation and abnormal response issues associated with the SFP level instrumentation.

Procedures will also address strategy to ensure SFP water addition is initiated at an appropriate time consistent with implementation of NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide.

*Testing and Calibration*

Testing and calibration of the instrumentation will be consistent with vendor recommendations or other documented basis. Calibration will be specific to the mounted instrument(s) and the display(s).

Existing station work control processes will be utilized to control maintenance and testing.

**Need for Relief and Basis:**

ONS is not requesting relief from the requirements of Order EA-12-051 or the guidance in NRC JLD-ISG-2012-03 and NEI 12-02 at this time.