

## **NRR-PMDAPEm Resource**

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**From:** Sreenivas, V  
**Sent:** Friday, August 23, 2013 3:46 PM  
**To:** Kent.alter@duke-energy.com  
**Cc:** Paul.guill@duke-energy.com; Parks, Benjamin; Jackson, Christopher; Guzzetta, Ashley; Pascarelli, Robert  
**Subject:** Oconee Nuclear Station, Units 1, 2, and 3, NRC Request For Additional Information on Errors Reported per 10 CFR 50.46 (TACs ME9119, ME9120, ME9121)

On March 9, 2012, Duke Energy Carolinas, LLC (Duke), submitted a report on emergency core cooling system (ECCS) analysis errors, ADAMS Accession No. ML12073A354, for Oconee Nuclear Station, Units 1, 2, and 3. On October 26, 2012, the Nuclear Regulatory Commission (NRC) staff issued a request for additional information (RAI), ML12300A201. On December 7, 2012, Duke replied to the RAI, ML12348A055. The NRC staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found below. Please provide a response to this RAI within 30 days of the date of this email.

### REQUEST FOR ADDITIONAL INFORMATION:

On October 15, 2012, the staff issued a Request for Additional Information (RAI) to the licensee (ADAMS Accession Number ML12278A273) regarding the 30-day report which stated the following:

10 CFR 50.46(a)(3)(ii) states: " ... If the change or error is significant, the applicant or licensee shall provide this report within 30 days and include with the report a proposed schedule for providing a reanalysis or taking other action as may be needed to show compliance with 50.46 requirements ... "

The PCT for LBLOCA for Oconee has changed by an absolute value of 160°F since the analysis was performed. Simply reporting the changes and errors in the methodology does not satisfy the intent of the regulation.

Justify not providing a schedule for reanalysis or taking other action to show compliance with Section 50.46.

The licensee responded to the RAI on December 7, 2012 (ADAMS Accession Number ML12348A055).

The RAI response does not include a proposed schedule for providing a reanalysis. In the response, the licensee states that the PCT error evaluations are supported by explicit analyses using the B&W plant ECCS evaluation model. Since a schedule for reanalysis was not provided, justify how generic analysis for the B&W plant ECCS evaluation model constitutes "taking other action" to show compliance with Section 50.46. In particular, while the submitted RAI response addresses the acceptance criteria contained in 10 CFR 50.46(b), the response does not address the requirement, at 10 CFR 50.46(a)(1)(i), to calculate "ECCS cooling performance..." "in accordance with an acceptable evaluation model."

In light of the presently reported, significant, estimated effects of errors and changes, explain how the present ECCS cooling performance has been calculated in accordance with an acceptable evaluation model, such that any other action, as provided in 10 CFR 50.46(a)(3), has been taken to show compliance with 10 CFR 50.46 requirements, including those contained in 10 CFR 50.46(a)(1). Alternatively, submit a schedule for providing a reanalysis or taking other action as may be necessary to show compliance with 10 CFR 50.46 requirements.

If you have any questions, please contact me at 301-415-2597.

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