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ONS-2014-053

April 10, 2014

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001


Subject: Duke Energy Carolinas, LLC (Duke Energy)  
Oconee Nuclear Station Units 3  
Docket Numbers 50-287  
Response to Request for Additional Information (RAI) regarding the Fourth Ten Year  
Interval ISI Plan, Relief Request 13-ON-001 (ADAMS Accession No. ML14040A014)

On September 26, 2013, Duke Energy submitted Relief Request 13-ON-001 (ADAMS Accession No. ML13273A037) pursuant to 10 CFR 50.55a(g)(5)(iii), requesting that NRC grant relief from the requirement to examine 100% of the volume specified by the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). On February 7, 2014, the NRC submitted a Request for Additional Information electronically (via E-mail) regarding this Relief Request. The Duke Energy response to the RAI questions is attached as an enclosure.

There are no regulatory commitments associated with this letter.

If you have any questions concerning this letter, or require additional information, please contact Corey Gray at (864) 873-6325.

Sincerely,

  
Scott L. Batson  
Vice President  
Oconee Nuclear Station

Enclosure:

Oconee Nuclear Station Unit 3, Duke Energy's Response to Request for Additional Information (RAI), Relief Request 13-ON-001, 3EOC-26 Limited Weld Examinations

A047  
NRR

U. S. Nuclear Regulatory Commission  
April 10, 2014  
Page 2

xc :

Mr. Victor McCree, Regional Administrator  
U.S. Nuclear Regulatory Commission – Region II  
Marquis One Tower  
245 Peachtree Center Ave., NE Suite 1200  
Atlanta, Georgia 30303-1257

Mr. James R. Hall, Project Manager (ONS)  
(by electronic mail only)  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Mail Stop O-8B1  
Rockville, MD 20852

Mr. Eddy Crowe  
NRC Senior Resident Inspector  
Oconee Nuclear Station

Susan Jenkins  
Section Manager  
Division of Waste Management  
SC Dept. of Health & Environment Control  
2600 Bull St.  
Columbia, SC 29201

**Enclosure**

**Oconee Nuclear Station Unit 3  
Duke Energy's Response to Request for Additional Information (RAI)  
Relief Request 13-ON-001  
3EOC-26 Limited Weld Examinations**

## DUKE ENERGY'S REPOSE to REQUEST for ADDITIONAL INFORMATION

### RAI-1

**Request for Relief 13-ON-001, Sections 6 & 7, ASME Code, Section XI, Examination Category B-J, Unit 3 Piping Welds, Low Pressure Injection System, Pipe to Valve (3CF-11 & 3CF-14), Welds 3-53A-15-26 & 3CF-126-4, Summary Numbers 03.B9.11.0106 & 03.B9.11.0129, ASME Code Class 1.**

- a. State the active degradation mechanisms for welds 3-53A-15-26 and 3CF-126-4, if any.

**Duke reply:** These welds were examined to satisfy the requirements of ASME Section XI, IWB-2500, Examination Category B-J, which does not require a degradation mechanism determination. See RAI-1(c) below for additional information.

- b. Are the welds part of a risk informed inservice inspection program?

**Duke reply:** No

- c. Is there any operational experience showing inservice cracking of similar welds exposed to similar environmental conditions?

**Duke reply:** A search was performed for cracking on these welds and similar welds, in our ISI database and the Duke Corrective Action Program and none was found.

### RAI-2

**Request for Relief 13-ON-001, Section 8 ASME Code, Section XI, Examination Category C-A, Item C1.30 Pressure Retaining Welds in Vessels for ON, Unit 3 Steam Generator A, Feedwater System, Tubesheet-to-Shell Weld # 3-SGA-W69 Summary Number 03.C1.30.0002, ASME Code Class 2.**

The NRC staff notes that in RR 13-ON-001, Section 8, conflicting examination methodologies are stated in the following subsections:

- In Paragraph 8.4, "Impracticability of Compliance," it is stated that, "scanning requirements are described in ASME Code, Section V, Article 4 T-441.1.2(a), T-441.1.3, T-441.1.4, T-441.1.5, and T-441.1.6."
- In Paragraph 8.5, "Proposed Alternative and Basis for Use," it is stated that "this weld was examined using procedures, equipment and personnel qualified in accordance with ASME Code, Section XI, Appendix VIII."
- It is also stated in Attachment "A", UT Calibration Examination Sheet (Page 81 of 96), that Procedure NDE-640 was used.

Please clarify what examination methodologies were used in examining Tubesheet-to-Shell Weld # 3-SGA-W69.

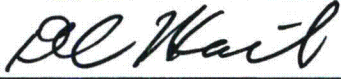
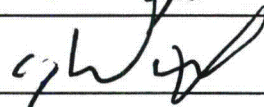
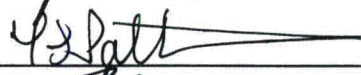
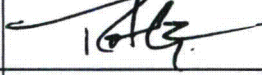
**Duke Reply:** This weld was inspected in accordance with ASME Section V, Article 4 requirements, as modified by ASME Section XI, Article 1, Table I-2000-1. Code required examinations were performed using Procedure NDE-820 and appropriately qualified personnel. A supplemental "zero degree" exam was performed using Procedure NDE-640 and appropriately qualified personnel, in addition to the Code required examinations. No flaws were detected in either exam.

**Outgoing Regulatory Correspondence  
Review & Approval Documentation**

**ATTACHMENT 2**  
Page 2 of 4

**PART IV – REVIEW AND APPROVAL**

Each Reviewer and Approver by their signature attests that, to the best of his or her knowledge, the input provided is accurate, complete, and free from Material False Statement.

Reviewer / Approver	Title / Organization	Signature, email, or telecom	Date
<b>Gary Scarboro</b>	Sr Tech Spc / ASME Sect XI Services	See ASME Services Review Form (attached)	<b>4-3-14</b>
<b>Ned Finney Jr</b>	Lead Nuc NDE Spc / ASME Sect XI Services	See ASME Services Review Form (attached)	<b>3-31-14</b>
<b>Sandy Clark</b>	Lead Engr / ASME Sect XI Services	See ASME Services Review Form (attached)	<b>4-3-14</b>
<b>Lester Stauffer</b>	Lead Nuc NDE Spc / Fleet Program Engr	See ASME Services Review Form (attached)	<b>3-31-14</b>
<b>Mark Pyne</b>	Manager / Nuc Engr Support	See ASME Services Review Form (attached)	<b>4-3-14</b>
<b>Reg. Affairs Lead: David Haile</b>	Lead Engr / Reg Affairs		<b>4-3-14</b>
<b>Peer Reviewer (Optional):</b>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
<b>Christopher J. Wasik</b>	<b>Manager / Reg. Affairs</b>		<b>4/4/14</b>
<b>Terry Patterson</b>	<b>Director / OE Org. Effectiveness</b>		<b>4/9/14</b>
<b>Bob Guy</b>	<b>Director / Site Support</b>		<b>4-9-2014</b>
<b>Signature Authority</b>	<b>Site Vice President</b>	<b>(Signs the letter)</b>	

Oath or Affirmation required on cover letter or enclosures?

YES NO 

Return To: **David Haile**  
Regulatory Affairs Lead

864-873-4742  
Extension