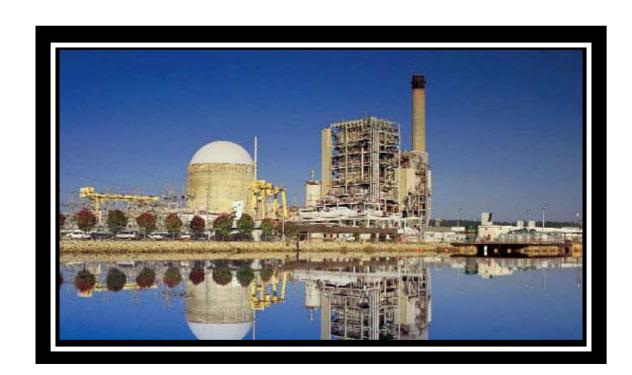


#### Robinson Nuclear Plant

# 24 Month Fuel Cycle Pre-Submittal Meeting March 4, 2015 1:00 to 3:00 PM





## Agenda

Opening Remarks/Meeting Objectives

Project Update/LAR Submittal Schedule

LAR Content

Closing Remarks



#### **Duke Attendees**

□ Jim Kammer RNP Engineering General Manager

☐ Gary Swider RNP 24 Month Fuel Cycle Project Lead

☐ Tim Tully RNP 24 Month Fuel Cycle Project Lead Eng

☐ Jeff Mungo RNP 24 Month Fuel Cycle Project Lead Eng

☐ Scott Connelly RNP Licensing



## **Opening Remarks**

#### Introductions

#### Meeting Objectives :

- Common understanding of the proposed scope of the Robinson LAR
- Understanding of the detail of information expected in the LAR
- Gain an understanding regarding regulatory positions on specific issues
- Discuss LAR schedule from submittal to NRC approval



#### LAR Content

#### Requirements of Generic Letter 91-04

- Surveillances Extensions
  - Calibration Surveillances
  - Non-calibration Surveillances
- ☐ Steam Generator Inspections
- Appendix J



Methodology Used to Evaluate Acceptability of Change to 24 Month Fuel Cycle

Engineering Evaluation will document changes and acceptability

- ☐ TS Surveillances
  - Calibrations
  - Non-calibrations
- ☐ Programs



Methodology Used to Evaluate Acceptability of Change to 24 Month Fuel Cycle

- Engineering Evaluation for Time Dependent Analyzed Drift (AD)
- ☐ Utilization of EPRI TR-103335 Rev 1 and 2
- ☐ Addresses seven items identified in Enclosure 2 of GL 91-04
- ☐ Use of Industry experts in Drift analysis
- ☐ Methodology similar to Oconee



Drift Analysis/Failure	Review	Methodology
□ Poviou of 10± voore	of Droviou	ic Calibrations

- ☐ Review of 10+ years of Previous Calibrations
- ☐ Statistical analysis to demonstrate extended interval acceptable.
- ☐ Review of 10+ years of Corrective maintenance.
- □ Document that all found failures would not go undetected due to a longer Technical Specification interval



Additional Analyses
☐ AST analysis approach in accordance with RG 1.183
Core Design
☐ Removal of partial length shield assemblies (PLSAs) and implementation of mid-enriched blankets
Fuel Design
☐ Change to standardized design with larger pellet diameter
Criticality Analyses
☐ May need to be revised to support fuel design changes



#### Precedent LARs –

Oconee 1,2,3 - Adams ML101330499 LAR Submittal

Adams ML110480489 RAI response

Adams ML11124A126 RAI Response

Adams ML11203A018 RAI Response

Adams ML091620074 Information

Adams ML101330499 Amendment Issuance

Indian Point 2,3 - Adams ML100320955 LAR Submittal

27 associated Adams documents



## Project Timeline/LAR Submittal Date

RNP 24 Month Fuel Cycle Project started

May 2014

RNP LAR Submittal

Summer 2016

Seeking NRC Approval Date

Late Summer 2018

24 Month Fuel Cycle Implementation

Fall 2018 RO32



#### Closing Remarks

- ☐ Any near term rulemaking that may affect the project?
- ☐ LAR submittal (s) NRC preference for one or multiple
- ☐ LAR time table acceptability