

# Robinson Nuclear Plant

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



# Agenda

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Opening Remarks/Meeting Objectives

Project Update/LAR Submittal Schedule

LAR Content

Closing Remarks

## Duke Attendees

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- |   |  |
|---|--|
| <input type="checkbox"/> Jim Kammer     | RNP Engineering General Manager          |
| <input type="checkbox"/> Gary Swider    | RNP 24 Month Fuel Cycle Project Lead     |
| <input type="checkbox"/> Tim Tully      | RNP 24 Month Fuel Cycle Project Lead Eng |
| <input type="checkbox"/> Jeff Mungo     | RNP 24 Month Fuel Cycle Project Lead Eng |
| <input type="checkbox"/> Scott Connelly | RNP Licensing                            |

# Opening Remarks

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## 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

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## Requirements of Generic Letter 91-04

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

## LAR Content (continued)

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### 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

## LAR Content (continued)

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### 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

## LAR Content (continued)

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### Drift Analysis/Failure Review Methodology

- ☐ 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



## LAR Content (continued)

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### 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

## LAR Content (continued)

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### 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

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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

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