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ONS-2015-023

February 27, 2015

10 CFR 50.4

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U.S. Nuclear Regulatory Commission
Washington, DC 20555

Duke Energy Carolina, LLC (Duke Energy)
Oconee Nuclear Station, Units 1, 2 and 3
Docket Numbers 50-269, 50-270, 50-287
Renewed License Numbers DPR-38, DPR-47, and DPR-55

Subject: Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. Nuclear Regulatory Commission (NRC) Order Number EA-12-049, Order Modifying Licensees With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012 (Accession No. ML12054A735).
2. Oconee Nuclear Station's Overall Integrated Plan in Response to March 12, 2012, Commission Order to Modify Licenses With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order EA-12-049), dated February 28, 2013 (Accession No. ML13063A065).
3. Oconee Nuclear Station's First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-basis External Events (Order Number EA-12-049), dated August 29, 2013 (Accession No. ML13246A009).
4. Oconee Nuclear Station's Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-basis External Events (Order Number EA-12-049), dated February 28, 2014 (Accession No. ML14064A197).
5. Oconee Nuclear Station's Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 27, 2014 (Accession No. ML14245A019).
6. NEI 12-06, [Rev. 0], Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, dated August 2012 (Accession No. ML12242A378).

AISI
NRC

Ladies and Gentlemen,

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-049 (Reference 1) to Duke Energy which was immediately effective and directed Duke Energy to develop guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. The Order required that, following NRC's issuance of its final Interim Staff Guidance (ISG), Duke Energy would submit an Overall Integrated Plan (OIP), followed by status reports at six-month intervals.

Duke Energy has thus far submitted the OIP (Reference 2), and three six-month reports (References 3, 4, and 5) for Oconee Nuclear Station. The purpose of this letter is to provide the fourth six-month status report. The enclosure provides updates related to compliance with NRC Order EA-12-049 and Nuclear Energy Institute (NEI) 12-06 (Reference 6) during the July 29, 2014 to January 28, 2015 update period.

This letter contains no new Regulatory Commitments and no revision to existing Regulatory Commitments.

Should you have any questions regarding this submittal, please contact David Haile with Oconee Regulatory Affairs, at (864) 873-4742.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 27, 2015.

Sincerely,



Scott L. Batson
Vice President
Oconee Nuclear Station

Enclosure:

1. Oconee Nuclear Station, Fourth Six-Month Status Report for Order EA-12-049 (FLEX), Units 1, 2, and 3.

ONS-2015-023
February 27, 2015
Page 3

cc:

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ENCLOSURE 1

**Oconee Nuclear Station (ONS)
Fourth Six Month Status Report for Order EA-12-049 (FLEX),
Units 1, 2, and 3**

1) Introduction

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-049 (Reference E1) to Duke Energy which required the development of guidance and strategies related to mitigation of a beyond-design-basis external event. The Order required each plant to issue an Overall Integrated Plan (OIP) pursuant to the NRC's Interim Staff Guidance (ISG) (Reference E2) which endorsed, with clarifications and exceptions, the industry guidance document, NEI 12-06 (Reference E3). The Order also required that update reports on progress or change to the OIP be submitted every six months.

An Overall Integrated Plan (Reference E4) was developed based on the diverse and flexible strategies (FLEX) from NEI 12-06 in response to NRC Order EA-12-049 and was submitted to the NRC on February 28, 2013. The first six-month update was provided to the NRC on August 29, 2013 (Reference E5). The second six-month update was provided to the NRC on February 28, 2014 (Reference E18). The third six-month update was provided to the NRC on August 27, 2014 (Reference E28). This report constitutes the fourth six-month update, and reports milestone accomplishments, changes to the compliance method or schedule, or any need for relief/relaxation, and the basis, which occurred during the period from July 29, 2014 to January 28, 2015 (hereafter referred to as "the update period").

2) Milestone Accomplishments (during the update period)

The following milestone(s) were completed:

1. The third six month status report was submitted August 27, 2014.
2. Based on current strategies, the N-1 Outage Walkdowns for Oconee Unit 1 were deemed as not necessary. Thus, that milestone is considered to have been completed.

3) Milestone Schedule Status

The following represents the milestone status at the end of the update period. The table reflects updates to the milestone table in Attachment 2 of the Overall Integrated Plan. It provides the status of each activity, and whether the target completion date has changed.

Note: The dates are planning dates, and are subject to change as design and implementation details are developed. Revised target completion dates are not expected to impact the implementation date(s) of the Order.

| Milestone | Target Completion Date | Activity Status | Revised Target Completion Date |
|--------------------------------|------------------------|-----------------|--------------------------------|
| Licensing Actions: | | | |
| Submit Overall Integrated Plan | Feb 2013 | Complete | Date Not Revised |
| Submit 6 Month Update 1 | Aug 2013 | Complete | Date Not Revised |
| Submit 6 Month Update 2 | Feb 2014 | Complete | Date Not Revised |
| Submit 6 Month Update 3 | Aug 2014 | Complete | Date Not Revised |
| Submit 6 Month Update 4 | Feb 2015 | This Submittal | Date Not Revised |
| Submit 6 Month Update 5 | Aug 2015 | Not Started | Date Not Revised |
| Submit 6 Month Update 6 | Feb 2016 | Not Started | Date Not Revised |
| Submit 6 Month Update 7 | Aug 2016 | Not Started | Date Not Revised |

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)

(Note: The references for this Enclosure are listed in Section 8)

| Milestone | Target Completion Date | Activity Status | Revised Target Completion Date |
|---|------------------------|-----------------|--------------------------------|
| Modifications: | | | |
| Develop Modifications | Aug 2016 | Started | Date Not Revised |
| Procurement: | | | |
| Identify Significant Material/Equipment | Sept 2013 | Complete | Date Not Revised |
| Material/Equipment Procurement/Delivery | May 2015 | Started | Date Not Revised |
| Implementation Walkdowns: | | | |
| Conduct N-1 Outage Walkdowns – U1 | Nov 2014 | Complete | Date Not Revised |
| Conduct N-1 Outage Walkdowns – U2 | Nov 2013 | Complete | Date Not Revised |
| Conduct N-1 Outage Walkdowns – U3 | May 2014 | Complete | Date Not Revised |
| Conduct Implementation Walkdowns – U1 | Oct 2016 | Not Started | Date Not Revised |
| Conduct Implementation Walkdowns – U2 | Oct 2015 | Not Started | Date Not Revised |
| Conduct Implementation Walkdowns – U3 | April 2016 | Not Started | Date Not Revised |
| Staffing: | | | |
| Conduct Staffing Analysis | July 2016 | Started | Date Not Revised |
| Training: | | | |
| Develop Training program – U1 | July 2016 | Started | Date Not Revised |
| Develop Training program – U2 | July 2015 | Started | Date Not Revised |
| Develop Training program – U3 | Jan 2016 | Started | Date Not Revised |
| Implement Training – U1 | Oct 2016 | Started | Date Not Revised |
| Implement Training – U2 | Oct 2015 | Started | Date Not Revised |
| Implement Training – U3 | April 2016 | Started | Date Not Revised |
| Procedures: | | | |
| Develop FLEX Supporting Guidelines (FSGs) | June 2016 | Started | Date Not Revised |
| Develop Maintenance Procedures | June 2016 | Not Started | Date Not Revised |
| Regional Response Centers: | | | |
| Develop Strategies/Playbook with RRC | April 2015 | Started | Date Not Revised |
| Install Offsite Delivery Pad | March 2015 | Started | August 2015 |
| Implementation: | | | |
| Implement Modifications – U1 | Nov 2016 | Started | Date Not Revised |
| Implement Modifications – U2 | Nov 2015 | Started | Date Not Revised |
| Implement Modifications – U3 | May 2016 | Started | Date Not Revised |

4) Changes to Compliance Method

No changes to compliance methods that are alternatives to NEI 12-06 were made.

5) Need for Relief and Basis for the Relief

Duke Energy Carolinas, LLC (Duke Energy), Oconee Nuclear Station, Units 1, 2, and 3 anticipates meeting the Order implementation date and no relief is required at this time.

6) Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary status of the Open Items. The table Section 6.a. provides the open items identified in the original OIP submitted on February 28, 2013. The table Section 6.b. provides a list of open items that were added after February 28, 2013 through the end of the update period. The table Section 6.c. provides a list of open and confirmatory items related to the Interim Staff Evaluation (ISE) (Reference E19). The table Section 6.d. addresses any generic concerns (No new generic issues were identified during this update period).

a) Open Items Documented in the Overall Integrated Plan

| Overall Integrated Plan Open Items | Status |
|--|--|
| 1. Revised PMP HMR51 Analysis | In Progress: 2.1 Flood Re-analysis Completed - Pending NRC Approval |
| 2. Max flood level on site 'after modifications' | In Progress: 2.1 Flood Re-analysis Completed - Pending NRC Approval |
| 3. Deployment Path Program | Started |
| 4. Procedures and FSGs | Started |
| 5. FLEX Equipment Programmatic Control | Started |
| 6. Personnel Training | Started |
| 7. FLEX Basis Document | Started |
| 8. Configuration Control | Started |
| 9. RRC | Started |
| 10. Cooldown Analysis | Started |
| 11. ADV Survivability and Accessibility | Started |
| 12. Load Shed Analysis | Completed (Reference E25, Attachment 3) |
| 13. Hydraulic Analysis for Pump Flow (Intake Canal to SGs) | Completed Analysis results are acceptable (Reference E22) |
| 14. Fuel Oil Consumption | Completed (Reference E25, Attachment 4) |
| 15. Hydraulic Analysis for Pump Flow (CTP-1 to SGs) | Completed Analysis results are acceptable (Reference E22) |

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)

(Note: The references for this Enclosure are listed in Section 8)

| Overall Integrated Plan Open Items | Status |
|--|--|
| 16. Water in embedded CCW lines & Hydraulic Analysis for Pumping Configuration | Completed (Reference E26) |
| 17. PSW Modification (EC 91877) | Completed |
| 18. Alternate FLEX Connections Modification (SG Makeup) | Completed (Reference E23) |
| 19. Breaking Siphons in Embedded CCW Piping | Started |
| 20. Instrumentation Repower (Alternate Repower Strategy) | Started |
| 21. FLEX Equipment Storage | Started |
| 22. Portable Power Distribution (Primary Repower Strategy) | Started |
| 23. Long term SG and SFP Makeup | Started |
| 24. Hydrogen Buildup Analysis | Completed (Reference E27 Section 3.14 and Attachment E) |
| 25. BWST Tap Analysis and Modification (RCS Makeup) | Started |
| 26. Containment Analysis | Started |
| 27. Hydraulic Analysis for Pump Flow (CTP-1 to SFPs & Intake Canal to SFPs) | Started |
| 28. Robustness of SFP Refill Lines | Completed Validated SFP Refill Lines are installed as QA-1 and are seismically robust (References E6 & E7) |
| 29. Lighting Evaluation | Not Started |
| 30. Communication Assessment | Started |
| 31. NEI 12-01 (Reference E24) Staffing Study | Started |
| 32. HVAC Analysis | Started |

b) Open Items added after February 28th, 2013

| Open Items | Status |
|---|---|
| 33. Evaluate changes to the RCSMU FLEX Strategy recommended by independent audit to eliminate the SSF RCMUP repower strategy and implement train specific diesel powered pump strategies (primary and alternate). | Completed (Reference E25 Attachment 2) |
| 34. Evaluate changing the alternate repower FLEX strategy to enhance deployment times by utilizing a small 120 VAC portable diesel generator (approximately 6000 watts) deployed on the Turbine Building deck to provide 120 VAC feeds to connections in the control room and cable room to repower the key instrumentation parameters. | Started |

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)

(Note: The references for this Enclosure are listed in Section 8)

| Open Items | Status |
|---|--------------------------------------|
| 35. Validate the 10' assumed inundation level discussed in the OIP [Assumption #8] is still conservative with respect to the Defense in Depth Modifications analyzed in OIP Reference 48 (which used a slightly modified model run) and the credited CAL model run in OIP reference 14. | This item superseded by Open Item 40 |
| 36. Perform raw water fouling analysis for core cooling and heat removal. | Started |
| 37. Evaluate freeze protection requirements in areas of the plant that contain equipment used in FLEX strategies. | Not Started |
| 38. Evaluate and establish a technical basis for use of non-safety related, installed equipment credited for mitigating an ELAP event. | Started |
| 39. FLEX Strategy for Shutdown Modes: Determine what mods, procedures, equipment, etc. is needed to support a Shutdown Modes FLEX Strategy. | Started |
| 40. Clarification of Applicable External Flooding Hazard at ONS. | Started |

c) Interim Staff Evaluation (ISE)

| ISE Open Items | Status |
|---|---|
| 1. Provide a description and justification for the specific evaluation model(s) used in the ELAP analyses for Oconee (ISE Open Item # 3.2.1.1.A). | Not Started |
| 2. The licensee should either (1) develop a successful mitigating strategy that does not rely on repowering the SSF RCMU pumps following recession of floodwaters or (2) provide adequate justification that the SSF RCMU pumps can reliably be repowered following recession of floodwaters (ISE Open Item # 3.2.1.6.A). | Completed (Reference E25 Attachment 2) |
| 3. Provide adequate basis that nitrogen from the core flood tanks will not be injected into the reactor coolant system (ISE Open Item # 3.2.1.6.B). | Not Started |
| 4. When further analyses are completed, the licensee should provide additional information that either supports a conclusion that pressurizer relief or safety valves do not lift during the ELAP event or that lifting of the valve(s), if it occurs, is acceptable (ISE Open Item # 3.2.1.6.C). | Not Started |

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)

(Note: The references for this Enclosure are listed in Section 8)

| ISE Open Items | Status |
|---|-------------|
| 5. Provide additional information demonstrating successful mitigation of an ELAP event involving an uncontrolled cooldown resulting from consequential damage to the main steam system due to the severe natural hazard that initiates the ELAP event (ISE Open Item # 3.2.1.6.D). | Started |
| 6. Demonstrate that Oconee's approach for modeling boric acid mixing is consistent with a generically acceptable methodology or develop a plant-specific technical basis to support the modeling assumptions for boric acid mixing in the ELAP analysis for Oconee (ISE Open Item # 3.2.1.8.B). | Not Started |

| ISE Confirmatory Items | Status |
|--|-------------|
| 7. Confirm that ONS's final FLEX equipment deployment routes include adequate consideration of potential soil liquefaction or other conditions that could impede movement following a severe seismic or other BOB event (Confirmatory Item # 3.1.1.2.A). | Not Started |
| 8. Confirm that the licensee's reference source providing guidance for operators to obtain instrument readings under ELAP conditions adequately addresses the considerations in NEI 12-06, Section 5.3.3, consideration (1) (Confirmatory Item # 3.1.1.3.A). | Not Started |
| 9. Confirm that the details for delivery and staging of off-site resources in the licensee's RRC playbook developed by the SAFER team and the utility are acceptable for all BDBEEs (Confirmatory Item # 3.1.1.4.A). | Not Started |
| 10. To show conformity with NEI 12-06, Section 6.2.3.2, consideration 2, confirm that persistent, prohibitive flooding levels will not occur at the ONS site (Confirmatory Item # 3.1.2.2.A). | Not Started |
| 11. Confirm that the final ELAP computer code analyses for core cooling, reactor coolant system inventory, shutdown margin, and containment integrity have acceptable methodology and assumptions and support the sequence of events timeline (Confirmatory Item # 3.2.1.1.B). | Not Started |
| 12. Reliance on the RELAP5/MOD2- Babcock & Wilcox (B&W) and RETRAN-30 codes in the ELAP analysis for B&W plants should be limited at the present time to the flow conditions prior to boiler-condenser cooling initiation. Confirm that the code is not used outside this range (Confirmatory Item # 3.2.1.1.C). | Not Started |
| 13. Confirm the means of isolating RCP seal return and RCS letdown in accordance with the Jocassee dam break procedure and the associated timeframe (Confirmatory Item # 3.2.1.2.A). | Not Started |

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)

(Note: The references for this Enclosure are listed in Section 8)

| ISE Confirmatory Items | Status |
|---|-------------|
| 14. Confirm that RCP seal temperature would be maintained at an acceptably low value by establishing injection flow to the RCP seals via the SSF RCMU pump within 20 minutes of event initiation (Confirmatory Item # 3.2.1.2.B). | Not Started |
| 15. Confirm there is justification for the assumed seal leakage rates for the Bingham RCPs with Sulzer seal assemblies (Confirmatory Item # 3.2.1.2.C). | Not Started |
| 16. Confirm there is justification for the assumed seal leakage rates for the Westinghouse 93-A RCPs with Flowserve N-9000 seals with the Abeyance feature (Confirmatory Item # 3.2.1.2.D). | Not Started |
| 17. Confirm that steam generator pressure indication will be available to support the cooldown directed by the ELAP mitigating strategy, or provide adequate basis that such indication is unnecessary even at average reactor coolant temperatures below 525 degrees Fahrenheit (Confirmatory Item # 3.2.1.5.A). | Started |
| 18. Confirm that the final containment analysis (open item 26) demonstrates that there will be no impact on the credited instrumentation (Confirmatory Item # 3.2.1.5.B). | Not Started |
| 19. When evaluations are completed, confirm that the survivability and performance of the atmospheric dump valves is adequate to support ONS's mitigation strategy (Confirmatory Item # 3.2.1.6.E). | Not Started |
| 20. Confirm that the analysis to determine Oconee's boration requirements in Phase 2 of the mitigating strategy provides acceptable results (Confirmatory Item # 3.2.1.8.A). | Not Started |
| 21. Confirm that the BWST design provides tornado missile protection to ensure a source of borated water (Confirmatory Item # 3.2.1.8.C). | Not Started |
| 22. Confirm the portable pump capability requirements and fuel requirements to implement Phase 2 and Phase 3 strategies (Confirmatory Item # 3.2.1.9.A). | Started |
| 23. Confirm acceptability of the SFP cooling strategy when it is completed (Confirmatory Item # 3.2.2.A). | Not Started |
| 24. Confirm that the results of the licensee's containment analysis beyond 72 hours are acceptable (ONS open item 26) (Confirmatory Item # 3.2.3.A). | Not Started |
| 25. Confirm using the analysis of hydrogen buildup (open item 24), that there will be no impact on the Phase 2 ventilation strategies (Confirmatory Item # 3.2.4.2.A). | Not Started |

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)

(Note: The references for this Enclosure are listed in Section 8)

| ISE Confirmatory Items | Status |
|---|--|
| 26. Confirm that the results of ONS's evaluation of building and area temperatures (licensee-identified open item 32), are acceptable to support the licensee's proposed ELAP mitigation strategies (Confirmatory Item # 3.2.4.2.B). | Not Started |
| 27. Confirm that the licensee's evaluation of freeze protection (ONS open item 37) is acceptable (Confirmatory Item # 3.2.4.3.A). | Not Started |
| 28. Confirm that the licensee's analysis of lighting (open item 29) is acceptable (Confirmatory Item # 3.2.4.4.A). | Not Started |
| 29. Confirm that upgrades to the site's communications systems have been completed (Confirmatory Item # 3.2.4.4.B). | Not Started |
| 30. Confirm that ONS's FLEX strategies with regard to protected and internal locked area access are acceptable (Confirmatory Item # 3.2.4.5.A). | Not Started |
| 31. Confirm that the use of non-safety related installed equipment (licensee's open item 38) is acceptable (Confirmatory Item # 3.2.4.7.A). | Not Started |
| 32. Confirm that the licensee's strategy for providing chemical treatment pond make up water at a rate of 700,000 gallons per day following a flooding event is acceptable. This is ONS Open Item 23 in the Integrated Plan (Confirmatory Item # 3.2.4.7.B). | Not Started |
| 33. Confirm that ONS's processes and procedures to prevent inappropriate interactions of portable electrical power sources with permanent plant equipment (ONS's open item 4) conforms to the guidance in NEI 12-06, Section 3.2.2, Guideline (13), or provides an acceptable alternative to that guidance (Confirmatory Item # 3.2.4.8.A). | Not Started |
| 34. Confirm that the licensee's FLEX generator sizing calculations/analysis and single line diagrams showing proposed connections of FLEX electrical equipment are acceptable (Confirmatory Item # 3.2.4.8.B). | Not Started |
| 35. Confirm that the licensee's fuel oil consumption analysis (licensee's open item 14) is acceptable (Confirmatory Item # 3.2.4.9.A). | Completed (Reference E25, Attachment 4) |
| 36. Confirm the licensee has considered the coordination of SSF and portable equipment during a "T=0" event, explaining what criteria will be used to determine when to switch from use of the SSF to use of portable equipment and to explain whether the SSF can be used beyond 72 hours (Confirmatory Item # 3.2.4.9.B). | Completed (Reference E25, Attachment 1) |

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)
 (Note: The references for this Enclosure are listed in Section 8)

| ISE Confirmatory Items | Status |
|--|---|
| 37. Confirm that the licensee's analyses on load shedding (licensee's open item 12), and summaries of battery sizing calculations for both seismic and flooding scenarios of ELAP are acceptable (Confirmatory Item # 3.2.4.10.A). | Completed (Reference E25 Attachment 3) |
| 38. Confirm that the licensee's implementation of maintenance and testing guidance for FLEX equipment is acceptable (Confirmatory Item # 3.3.1.A). | Not Started |
| 39. Offsite Resources - Confirm NEI 12-06 Section 12.2, Guidelines 2 through 10, are addressed with SAFER (Confirmatory Item # 3.4.A). | Not Started |

d) Generic Concerns

The following summarizes ONS's review of six generic issues:

- i. **Electric Power Research Institute (EPRI) Report 3002001785, Use of Modular Accident Analysis Program (MAAP) in Support of Post-Fukushima Applications and NRC endorsement (Reference E8 & Reference E17).**
 - The Oconee mitigating strategy is evaluated using RELAP5 and RETRAN for the NSSS response, and FATHOMS and GOTHIC for the containment response.
- ii. **Electric Power Research Institute (EPRI) Report 3002000623, Nuclear Maintenance Applications Center: Preventive Maintenance Basis for FLEX Equipment and NRC endorsement (Reference E9 & Reference E10).**
 - ONS intends to follow EPRI Report 3002000623 in the development of maintenance and testing programs for equipment acquired in response to Mitigation Strategies Order EA-12-049 unless otherwise justified.
- iii. **Westinghouse report, Westinghouse Response to NRC Generic Request for Additional Information (RAI) on CENTS Code in Support of the Pressurized Water reactor Owners Group (PWROG) and NRC endorsement (Reference E11 & Reference E12).**
 - The Oconee mitigating strategy is evaluated using RELAP5 and RETRAN for the NSSS response, and FATHOMS and GOTHIC for the containment response.
- iv. **Nuclear Energy Institute (NEI) position paper, Position Paper: Shutdown/Refueling Modes and NRC endorsement (Reference E13 & Reference E14).**
 - It is Oconee's intent to abide by the NEI position paper for shutdown and refueling modes.

(Note: The references for this Enclosure are listed in Section 8)

- v. **Nuclear Energy Institute (NEI) white paper, Battery Life Issue and NRC endorsement (Reference E15 & Reference E16).**
- The SSF has a design basis mission time of 72 hours. ONS plans to utilize the SSF as long as it remains operational. After an ELAP is determined, ONS will utilize the SSF in a dual loop feed to cooldown to 240-250 degrees. ONS will simultaneously deploy Phase 2 equipment during this timeframe utilizing the priority established from our thermal-hydraulic analysis. All instrument readings required to support the ELAP cool down are available in the SSF during this Phase 1 time period. This will allow time to deploy the primary repower strategy to repower the vital battery chargers and associated busses without performing additional load shedding. This approach eliminates resources required to perform additional load shedding activities on all 3 units in the T+2, to T+3 hour timeframe in which many critical activities are underway and eliminates potential unanticipated interactions created by load shed activities. Based on the above, the station vital batteries will be available for approximately 4 hours after loss of power.
- vi. **Westinghouse position paper, Westinghouse Response to NRC Generic Request for Additional information (RAI) on Boron Mixing in support of the Pressurizer Water Reactor Owners Group (PWROG) and NRC endorsement (References E20 & E21).**
- Oconee Nuclear Station will address this generic issue in the ISE Open Item # 3.2.1.8.B.

7) Potential Interim Staff Evaluation Impacts

There are no potential impacts from the Interim Staff Evaluation identified.

8) References

The following references support the updates to the Overall Integrated Plan described in this enclosure:

- E1.** NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012 (Accession No. ML12054A735).
- E2.** NRC Interim Staff Guidance JLD-ISG-2012-01, *Compliance with Order EA-2-049, Order Modifying Licenses with Regard to Requirements for Mitigation strategies for Beyond-Design-Basis External Events*, dated August 29, 2012 (Accession No. ML12229A174).
- E3.** NEI 12-06, Revision 0, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, dated August 2012 (Accession No. ML12242A378).
- E4.** Duke Energy Letter, *Oconee Nuclear Station, Units 1 ,2 and 3 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated February 28th, 2013 (Accession No. ML13063A065).
- E5.** Duke Energy Letter, *First Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated August 29, 2013 (Accession No. ML13246A009).
- E6.** Flow Diagram - Unit 1 & 2 Spent Fuel Cooling System (104A-1.1, Revision 53).

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)

(Note: The references for this Enclosure are listed in Section 8)

- E7. Flow Diagram - Unit 3 Spent Fuel Cooling System (104A-3.1, Revision 48).
- E8. EPRI Report 3002001785, *Use of Modular Accident Analysis Program (MAAP) in Support of Post-Fukushima Applications*, dated June 2013 (Accession No. ML13190A201).
- E9. EPRI Report 3002000623, *Nuclear Maintenance Applications Center: Preventive Maintenance Basis for FLEX Equipment*, dated September 2013 (Accession No. ML13276A573).
- E10. NRC letter from Jack R. Davis, Director Mitigating Strategies Directorate (NRR), to Nuclear Energy Institute, Mr. Joseph E. Pollock Vice President Nuclear Operations, dated October 7, 2013 (Accession No. ML13276A224).
- E11. Westinghouse Report, *Westinghouse Response to NRC Generic Request for Additional Information (RAI) on CENTS Code in Support of the Pressurized Water reactor Owners Group (PWROG)*, dated September 25, 2013 (Withheld from public disclosure).
- E12. NRC letter from Jack R. Davis, Director Mitigating Strategies Directorate (NRR), to Jack Stringfellow, PWR Owners Group, Program Management - Westinghouse, October 7, 2013 (Accession No. ML13276A555).
- E13. NEI Position Paper, *Shutdown/Refueling Modes*, dated September 18, 2013 (Accession No. ML13273A514).
- E14. NRC letter from Jack R. Davis, Director Mitigating Strategies Directorate (NRR), to Nuclear Energy Institute, Mr. Joseph E. Pollock, Vice President Nuclear Operations, dated September 30, 2013 (Accession No. ML13267A382).
- E15. NEI White Paper, *Battery Life Issues*, dated August 21, 2013 (Accession No. ML13241A186).
- E16. NRC letter from Jack R. Davis, Director Mitigating Strategies Directorate (NRR), to Nuclear Energy Institute, Mr. Joseph E. Pollock, Vice President Nuclear Operations, dated September 16, 2013 (Accession No. ML13241A188).
- E17. NRC letter from Jack R. Davis, Director Mitigating Strategies Directorate (NRR), to Nuclear Energy Institute, Mr. Joseph E. Pollock, Vice President Nuclear Operations, dated October 3, 2013 (Accession No. ML13275A318).
- E18. Duke Energy Letter, *Second Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated February 28, 2014 (Accession No. ML14064A197).
- E19. NRC letter from Jeremy S. Bowen, Mitigating Strategies Directorate (NRR), Mr. Scott Batson, Site Vice President Oconee Nuclear Station, dated February 10, 2014 (Accession No. ML 13365A258).
- E20. Westinghouse Position Paper, *Westinghouse Response to NRC Generic Request for Additional Information (RAI) on Boron Mixing in support of the Pressurizer Water Reactor Owners Group (PWROG)*, dated August 16, 2013 (Accession No. ML13235A135).
- E21. NRC letter from Jack R. Davis, Director Mitigating Strategies Directorate (NRR), to Jack Stringfellow, PWR Owners Group, Program Management - Westinghouse, dated January 8, 2014 (Accession No. ML13276A183).
- E22. ONS Hydraulic Analysis Calculation - 11232.
- E23. ONS Engineering Change Document - 113065.

ENCLOSURE: ONS FOURTH SIX-MONTH STATUS REPORT (ORDER EA-12-049) (FLEX)

(Note: The references for this Enclosure are listed in Section 8)

- E24.** NEI 12-01, Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities, Revision 0, May 2012 (Accession No. ML12125A412).
- E25.** ONS Select Fukushima Related Technical Evaluations, Analyses, and Position Papers Calculation -11383.
- E26.** ONS FLEX Strategy Intermediate Cooling Hydraulic Calculation -11329.
- E27.** ONS Auxiliary Building GOTHIC Heat-Up Analysis - ELAP Event Cases - 11253.
- E28.** Duke Energy Letter, *Third Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated August 27, 2014 (Accession No. ML14245A019).