



Scott L. Batson  
Vice President  
Oconee Nuclear Station

Duke Energy  
ON01VP | 7800 Rochester Hwy  
Seneca, SC 29672

o: 864.873.3274  
f: 864.873.4208  
Scott.Batson@duke-energy.com

ONS-2015-022

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10 CFR 50.4

ATTN: Document Control Desk  
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 Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

**References:**

1. NRC Order Number EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012 (Accession No. ML12054A679).
2. Duke Energy Letter, *Overall Integrated Plans in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2013 (Accession No. ML13086A095).
3. Duke Energy Letter, *First Six-month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated August 26, 2013 (Accession No. ML13242A009).
4. NRC Letter, *Oconee Nuclear Station, Interim Staff Evaluation and Request for Additional Information-Oconee Nuclear Station, Units 1, 2 and 3 Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated November 1, 2013 (Accession No. ML13298A696).
5. Duke Energy Letter, *Second Six-month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2014 (Accession No. ML14064A197).
6. NRC Letter, *Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051*, Dated March 26, 2014 (Accession No. ML14083A620).
7. Duke Energy Letter, *Third Six-month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated August 27, 2014 (Accession No. ML14245A019).

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NRK

Ladies and Gentlemen,

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 (Reference 1) to Duke Energy which was immediately effective and directed Duke Energy to have a reliable indication of water level in associated spent fuel storage pools. 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, 5, and 7) for Oconee Nuclear Station. By letter dated November 1, 2013 the NRC staff provided an Interim Staff Evaluation (ISE) and Request for Additional Information (RAI) (Reference 4) regarding the OIP. By letter dated March 26, 2014 (Reference 6), the NRC directed licensees not to formally submit their RAI responses on the docket but instead to make their responses and supporting information available on their e-Portals. All RAI responses are to be available on the e-Portals by the date identified in the ISE.

The purpose of this letter is to provide the fourth six-month status report. The enclosure provides updates related to OIP changes, if any, during the July 29, 2014 to January 28, 2015 update period. Responses to the RAIs are to be placed on the Oconee Nuclear Station ePortal by March 31, 2015 as specified in the ISE, and thus no RAI responses are included in this report.

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-12-051 (SFPI), Units 1, 2 and 3.

cc:

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. William Dean, Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

Mr. James R. Hall, Project Manager (ONS)  
(by electronic mail only)  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike, M/S O-8G9A  
Rockville, MD 20852-2746

Mr. Jeffery Whited  
(by electronic mail only)  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Mail Stop O-8B1A  
Rockville, MD 20852

Mr. Eddy Crowe  
NRC Senior Resident Inspector  
Oconee Nuclear Station

## **ENCLOSURE 1**

**Oconee Nuclear Station (ONS)  
Fourth Six Month Status Report for the Implementation of Order EA-12-051 (SFPI)  
Units 1, 2 and 3**

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

## **1 Introduction**

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 (Reference E1) to Duke Energy directing them to develop a reliable indication of water level associated with spent fuel storage pools. 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 12-02 (Reference E3). The Order also required that update reports on progress or change to the OIP be submitted every six months.

Oconee Nuclear Station (ONS) developed and submitted an Overall Integrated Plan on February 28, 2013 (Reference E4), describing how compliance with the requirements in the Order would be achieved. The required six-month update reports were submitted on August 26, 2013, February 28, 2014, and August 27, 2014 (Reference E5, E6, and E10). The OIP and six-month status reports follow the guidance of NEI 12-02 (as endorsed by the NRC).

This report constitutes the fourth six-month report. It provides updates, if any, of milestones, changes to the compliance method or schedule, or a basis for relief/relaxation. The report addresses the period from July 29, 2014 to January 28, 2015 (hereafter referred to as "the update period").

The NRC issued ONS a Request for Additional Information (RAI) dated June 21, 2013 (Reference E7) related to the Order. Subsequently, the NRC issued ONS an Interim Staff Evaluation (ISE) of the OIP on November 1, 2013 (Reference E8) and included a Request for Additional Information (RAI) which superseded the previous RAI. This RAI requested that responses be included in subsequent six-month reports. Most recently the NRC issued an Audit Plan for the Order on March 26, 2014 (Reference E9) which directed licensees not to formally submit their RAI responses on the docket but instead, put their responses and supporting information on the ePortals for staff review, by the date identified in their ISE. Accordingly, ONS will place the RAI responses on the ePortal by March 31, 2015 as specified in the ISE, and thus no RAI responses are included in this report.

## **2 Milestone Accomplishments**

No milestones were completed during the update period.

## **3 Milestone Schedule Status**

There are no changes to the schedule as reported in the OIP (Reference E4).

## **4 Changes to Compliance Method**

No changes were made during the update period.

## **5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

ONS expects to comply with the order implementation date and no relief/relaxation is required at this time.

## **6 Open Items from Overall Integrated Plan and Interim Staff Evaluation**

There are no open items documented in the Overall Integrated Plan or in the Interim Staff Evaluation (ISE). This six-month status report contains no RAI responses.

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

## 7 Potential Interim Staff Evaluation Impacts

No potential impacts to the Interim Staff Evaluation have been identified.

## 8 References

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

- E1. NRC Order EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012 (Accession No. ML120554A679).
- E2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, dated August 29, 2012, (Accession No. ML12221A339).
- E3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation", Revision 1, dated August 2012 (Accession No. ML12240A307).
- E4. Duke Energy Letter, Overall Integrated Plans in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013 (Accession No. ML13086A095).
- E5. Duke Energy Letter, First Six-month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 26, 2013 (Accession No. ML13242A009).
- E6. Duke Energy Letter, Second Six-month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2014 (Accession No. ML14064A197).
- E7. NRC letter, Oconee Nuclear Station, Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated June 21, 2013 (Accession No. ML1317A301).
- E8. NRC Letter, Oconee Nuclear Station, Interim Staff Evaluation and Request for Additional Information-Oconee Nuclear Station, Units 1, 2 and 3 Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) Dated November 1, 2013 (Accession No. ML13298A696).
- E9. NRC Letter, Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051, Dated March 26, 2014 (Accession No. ML14083A620).
- E10. Duke Energy Letter, Third Six-month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 27, 2014 (Accession No. ML14245A019).