March 30, 1999

MEMORANDUM TO:

Bruce S. Mallett, Director Division of Reactor Safety

David B. Matthews, Director Division of Regulatory Improvement Programs Office of Nuclear Reactor Regulation

FROM:

Luis A. Reyes, Regional Administrator

Samuel J. Collins, Director Office of Nuclear Reactor Regulation

SUBJECT:

9904060290

PDR

990330

OCONEE LICENSE RENEWAL INSPECTION

Attached is the final version of the Oconee Nuclear Station License Renewal Inspection

Plan. The plan, which was developed jointly by NRR and Region II, is hereby approved. You

are directed to use this plan to prepare and conduct the license renewal inspections at Oconee.

foriginal signed by S. J. Collins) Samuel J. Collins, Director Office of Nuclear Reactor Regulation Date: 3/30/99

50-269/270/287

(Original signed by L. A. Reyes)

Luis A. Reyes, Regional Administrator Region II Date: 3/29/99

N

DMATTHEWS

3/20/99

Attachment: Oconee Nuclear Station License Renewal Inspection Plan

**\*FOR PREVIOUS CONCURRENCE SEE ATTACHED COPY** OFFICE **RII:DRS** RII:DRS **BII:DRS** DRP NRR NRR SIGNATURE NAME **CJULIAN\*** VMCCREE\* BMALLETT\* LPLISCO\* RPRATO CGRIM DATE 3/ /99 3/ /99 3/ /99 3/ /99 3/ 3/ 199 3/*3*/3/99

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OFFICIAL RECORD COPY DOCUMENT NAME: A:\OLRP.WPD

Oconee Nuclear Station (Lisse Renewal) cc: Ms. Lisa F. Vaughn

Duke Energy Corporation 422 South Church Street Mail Stop PB-05E Charlotte, North Carolina 28201-1006

Anne W. Cottingham, Esquire Winston and Strawn 1400 L Street, NW. Washington, DC 20005

Mr. Rick N. Edwards Framatome Technologies Suite 525 1700 Rockville Pike Rockville, Maryland 20852-1631

Manager, LIS NUS Corporation 2650 McCormick Drive, 3rd Floor Clearwater, Florida 34619-1035

Senior Resident Inspector U. S. Nuclear Regulatory Commission 7812B Rochester Highway Seneca, South Carolina 29672

Regional Administrator, Region II U. S. Nuclear Regulatory Commission Atlanta Federal Center 61 Forsyth Street, SW, Suite 23T85 Atlanta, Georgia 30303

Virgil R. Autry, Director Division of Radioactive Waste Management Bureau of Land and Waste Management Department of Health and

Environmental Control 2600 Bull Street Columbia, South Carolina 29201-1708

County Supervisor of Oconee County Walhalla, South Carolina 29621

W. R. McCollum, Jr., Vice President Oconee Site Duke Energy Corporation P. O. Box 1439 Seneca, SC 29679



Mr. J. E. Burchfield Compliance Manager Duke Energy Corporation Oconee Nuclear Site P. O. Box 1439 Seneca, South Carolina 29679

Ms. Karen E. Long Assistant Attorney General North Carolina Department of Justice P. O. Box 629 Raleigh, North Carolina: 27602

L. A. Keller Manager - Nuclear Regulatory Licensing Duke Energy Corporation 526 South Church Street Charlotte, North Carolina 28201-1006

Mr. Richard M. Fry, Director Division of Radiation Protection North Carolina Department of Environment, Health, and Natural Resources 3825 Barrett Drive Raleigh, North Carolina 27609-7721

Gregory D. Robison Duke Energy Corporation Mail Stop EC-12R P. O. Box 1006 Charlotte, North Carolina 28201-1006

Robert L. Gill, Jr. Duke Energy Corporation Mail Stop EC-12R P. O. Box 1006 Charlotte, North Carolina 28201-1006 RLGILL@DUKE-ENERGY.COM

Douglas J. Walters Nuclear Energy Institute 1776 I Street, NW Suite 400 Washington, DC 20006-3708 DJW@NEI.ORG

Chattooga River Watershed Coalition P. O. Box 2006 Clayton, GA 30525 Distribution: Hard copy PUBLIC Docket-File RLSB RF N. Dudley, ACRS T2E26

E-mail;

R. Zimmerman

W. Kane

D. Matthews

S. Newberry

C. Grimes

F. Akstulewicz

J. Strosnider

R. Wessman

G. Bagchi

H. Brammer

T. Hiltz

G. Holahan

C. Gratton

R. Correia

R. Latta

J. Peralta

J. Moore

R. Weisman

M. Zobler

F. Cherny

E. Hackett

A. Murphy

D. Martin

W. McDowell

S. Droggitis

PDLR Staff

-----

H. Berkow

D. LaBarge

L. Plisco

C. Ogle

R. Trojanowski

M. Scott

C. Julian

B. Zalcman

J. Wilson

C. Sochor

## OCONEE NUCLEAR STATION LICENSE RENEWAL INSPECTION PLAN

## I. PURPOSE

This inspection plan provides Region II with guidance for implementing Inspection Manual Chapter 2515 and 2516 requirements for the verification of information, programs and activities relating to 10 CFR Part 54 (herein referred to as "the rule") and the Oconee Nuclear Station (ONS) license renewal programs and activities. This plan defines the scope of the inspections planned to verify that the ONS's license renewal program is in compliance with the requirements of the rule, and is consistent with Duke Energy Corporation's (DEC) license renewal application (LRA) and the staff's safety evaluation of DEC's LRA. This plan also provides guidance for inspection scheduling, inspector training, inspection activities, resource requirements, and resource allocation.

The DEC LRA identified the systems, structures, and commodity groups that it determined were within the scope of the rule. Attachment 1 contains a list of those specific systems, structures, and commodity groups, aging effects and aging management programs that may be selected for inspection based on risk significance, uniqueness to ONS, and current issues. However, the scope and depth of inspections in these areas will vary. Attachment 2 is a list of acronyms applicable to the DEC inspection activities for license renewal. Attachment 3 contains a list of reference materials.

#### II. OBJECTIVES

The overall objective of this plan is to provide guidance for inspecting the implementation, and effectiveness of the programs and activities associated with DEC's license renewal program to verify that there is reasonable assurance that the effects of aging will be adequately managed such that the intended function(s) of structures and components (SC)<sup>1</sup> requiring an aging management review will be maintained consistent with the current licensing basis (CLB) during the period of extended operation. To accomplish this objective, the inspection team will perform the following inspection activities on a sample of systems, structures and commodity groups within the scope of this inspection plan (refer to Attachment 1), to verify, with reasonable assurance, that the requirements of 10 CFR Part 54 have been fulfilled:

1. Verify that the scoping (10 CFR 54.4) and screening (10 CFR 54.21[a][1]) activities implemented by DEC are consistent with the rule, DEC's methodology submitted for staff review, the staff's safety evaluation of that methodology, the guidance provided in DG-1047, "Standard Format and Content for the Application to Renew Nuclear Power Plant Operating Licenses," dated August 1996, and documented staff positions, as applicable.

Reference footnote in SOC on page 60 FR 22462 for clarification between SSC and SC.

- 2. Verify that the aging management programs were implemented consistent with the rule, the LRA, the staff's safety evaluation report (SER) of the LRA, and NRC approved guidance including the Statements of Consideration (SOC), DG 1047, and documented staff positions.
- 3. Verify that there is reasonable assurance that the demonstration provided by DEC is consistent with the rule, LRA, staff's SER, and the results from implementing the aging management programs at ONS.
- 4. Verify that the information and documentation required by, or otherwise necessary to document compliance with the provisions of the rule are maintained in an auditable and retrievable form.

#### III. INSPECTION REQUIREMENTS

Each inspector will receive basic license renewal inspection program (LRIP) training. In addition, the inspection team will be provided team training on the ONS LRA and the staff's safety evaluation of that application. Training will be given as part of the inspection preparation effort.

The acceptance criteria for the staff verification activities will be derived from the rule, the description of the programs and activities as documented in the LRA, and the documented review performed by the staff in the safety evaluation report. To verify the completeness of the scope selected by DEC, the staff will review five systems and three structures not identified as being within the scope of the rule by the applicant against the scoping criteria under 10 CFR 54.4(a) to identify potential omissions from the scope selected by the applicant. In addition, the staff will perform system walk-downs and review maintenance history to confirm that applicable aging effects have been identified in the LRA.

Consistent with the Commission guidance in the SOC, probabilistic methods may be used as a supplemental tool to assess the relative importance of structures and components that are subject to an aging management review by drawing attention to specific vulnerabilities (e.g., results of an IPE or IPEEE). Probabilistic insights may assist in developing an approach for aging management adequacy. However, probabilistic insights alone will not be an acceptable basis for concluding that, for those structures and components subject to an aging management review, the effects of aging will be adequately managed in the period of extended operation.

#### IV. INSPECTION ACTIVITIES

The LRIP will be implemented at ONS, prior to the approval of its LRA to verify that DEC meets the requirements of the rule and has implemented license renewal programs and activities consistent with the rule, their application, and the staff's safety evaluation

report (SER) of the LRA, Commission and staff approved guidance, and documented staff positions, as applicable.

Inspection Procedure (IP) 71002, "License Renewal Inspections," will be the primary procedure used to inspect DEC's implementation of the requirements of the rule. Various other IPs will be used to verify the implementation of the individual aging management programs. This inspection plan will be used to define the inspection activities and the implementation of these activities.

This inspection plan will be reviewed and approved by NRR and the Region II Regional Administrator prior to implementation. Substantive changes to the approved inspection plan will be approved by the Director, Division of Reactor Safety, Region II and the Director, License Renewal Project Directorate, NRR (PDLR) or his designee. After inspection activities begin, changes to the inspection plan will be approved and documented as an attachment to the original plan.

The basic scope of the ONS inspection will be performed on the systems, structures, and commodity groups identified in Attachment 1 attached to this plan. The selection of these systems, structures, and commodity groups is based on risk significance, uniqueness to ONS, and current issues.

- 1. The inspection team will verify that DEC implemented the scoping methodology consistent with the rule, and DEC's methodology as detailed in their License Renewal Application submitted July 6, 1998. The inspection team will also inspect five systems and three structures not included within the scope of the rule by DEC's process to verify that there is reasonable assurance that all systems and structures that meet the criteria under 10 CFR 54.4 were identified. The inspection team will use *IP-71002, § 02.02.a and § 03.02.a* for this inspection.
- 2. The implementation of screening activities required under 10 CFR 54.21(a)(1) will be inspected by reviewing the evaluation boundaries, intended functions, and active/passive or short/long-lived characteristics of the structures and components (SC) included within the scope of DEC's aging management review for the systems, structures and commodity groups listed in Attachment 1. These inspection activities will be implemented to verify that DEC's process was implemented consistent with the rule, DEC's methodology submitted for staff review, and the staff's safety evaluation of that methodology. The inspection team will also walkdown the systems and structures, as available, to identify any observable inconsistencies with the scoping and screening activities. The inspection team will use *IP-71002*, § 02.02.b.1 and § 03.02.b.1 for this inspection.

For more information on the screening activities refer to the following reference:

system/structural-level intended function(s) refer to 10 CFR 54.4(a), 54.4(b), 54.21(a)(1)(i), 60FR22467, and NEI 95-10,§3.2;

- evaluation boundaries refer to 60FR22467, and NEI 95-10, §4.1.1;
- component/structural component-level intended function(s) refer to 60FR22467, and NEI 95-10, §4.1.2;
- active/passive determination as defined under 10 CFR 54.21(a)(1)(i) refer to 60FR22477, and NEI 95-10, §4.1.2 and Attachment B, and
- short/long-lived determination as defined under 10 CFR 54.21(a)(1)(ii) refer to 60FR22478, and NEI 95-10, §4.1.2.
- The inspection team will verify that there is reasonable assurance that evident aging effects (refer to 60FR22468, and NEI 95-10.§ 4.2.1.1) for the systems, structures and components requiring an aging management review have been identified by DEC. Although the aging effects identified by DEC will be reviewed during the NRR technical review, the inspection team will identify any aging effects observed during walkdowns and physical inspections of the different systems, structures and commodity groups that are not included in the LRA. In addition, the inspection team will perform a sample inspection of related maintenance records of the systems, structures and commodity groups from Attachment 1 to identify ongoing aging not identified by DEC. The inspection team will use IP-71002, § 02.02.b.2 and § 03.02.b.2 for this inspection.
- 4. The inspection team will inspect the aging management programs (Refer to 60FR22474 and NEI 95-10, § 4.2.1.2) for approximately half of the aging effects in each of the systems, structures, and commodity groups identified in Attachment 1. The inspections will be used to verify that DEC implemented the aging management programs as identified in its LRA and the staff's safety evaluation. The inspection team will also perform a sample inspection of related maintenance records for the systems, structures and commodity groups in Attachment 1 to identify ongoing aging that is not being managed consistent with the aging management programs in place. The inspection team will also walkdown systems and structures, and inspect structures and components, as plant conditions allow, to identify ongoing aging that is not being managed. Based on their observations from these inspection activities, the inspection team will document their findings relative to the effectiveness of an aging management program to maintain an intended function(s) consistent with the CLB for the period of extended operation. The inspection team will use IP-71002. § 02.02.b.3. and § 03.02.b.3 to inspect the implementation activities. The inspection of the aging management programs and resulting effectiveness from implementing these programs will be performed by using a variety of existing inspection procedures from the IMC 2515 inspection program as applicable.

An inspection of DEC's supporting information and objective evidence relating to the demonstration (Refer to 10 CFR 54.21(a)(3), and NEI 95-10, §4.2.1.3, § 4.2.2.2, and § 4.2.3.2) of the aging management programs inspected in item 4 above, including a review of program documentation and a review of the applicable maintenance records will be used to verify that there is reasonable assurance that the demonstrations provided by DEC are consistent and complete with the results from implementing the applicable aging management programs at ONS. The inspection team will use

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*IP-71002, § 02.02.b.4, § 03.02.b.4,* and existing IMC 2515 inspection procedures for this inspection activity.

6. An inspection of the documentation for the programs and activities relating to the scoping, screening, aging management, and demonstrations will be used to verify that the information and documentation (Refer to 10 CFR 54.21 and 54.37, 60FR22482, and NEI 95-10, § 3.3, § 4.4, § 5.3, and § 6.0) required by, or otherwise necessary to document compliance with the provisions of the rule are maintained in an auditable and retrievable form. The inspection team will use *IP-71002* for this inspection activity.

## V. PLANNED INSPECTIONS

The ONS license renewal inspection activities will be implemented through three siteinspections.

1. <u>First Inspection</u> - The first inspection will primarily consist of an inspection of the scoping and screening process described above (IV.1 and IV.2) to verify that these processes have been implemented consistent with the rule, DEC's methodology, and the staff's safety evaluation of DEC's methodology. This inspection must be performed after the staff's safety evaluation of the scoping and screening methodology is complete. In addition, this inspection will be used to verify that there is reasonable assurance that the implementation of DEC's scoping and screening processes have identified the systems, structures, and components, requiring an aging management review consistent with the requirements of the rule.

The first inspection includes the following:

- a. Prior to the inspection preparation week, the Team Leader will review this inspection plan, DEC's methodology, the staff's safety evaluations of the methodology, and the LRA to assign various inspection activities to individual team members for detailed review during inspection preparation. The goal for assigning these inspection activities is to allow each team member to become familiar with the scope of the inspection, and for each team member to prepare for their role in the inspection process.
- b. During preparation week, the Team will review the necessary documentation. For the systems, structures, and commodity groups assigned to each inspection, the inspector will prepare to verify that DEC implemented its methodology consistent with the rule, the methodology in its LRA, the staff's safety evaluation of that methodology, NRC approved guidance, and documented staff positions. The inspector will review the system/structural-level intended functions identified by DEC to verify that they fulfill the requirements and criteria of the rule and the applicable guidance documents. The inspectors will familiarize themselves with the systems and structures assigned and their evaluation boundaries to identify any components or structural components not included within the evaluation boundary that may fulfill the intended functions relating to the scoping criteria

under 10 CFR 54.4. The inspectors will prepare to inspect the active/passive and the long/short-lived determination to verify that they were made consistent with the rule, staff approved guidance, and staff positions.

During the on-site inspection, the team will implement the inspection activities defined in Sections IV.1, IV.2, and IV.6 of this inspection plan.

d. During the week following the on-site inspection, the team members will submit their documented findings within the time specified by the team leader. The team leader will develop the final inspection report consistent with NRC guidance in inspection Manual Chapters.

<u>Second Inspection</u> - The second inspection is expected to be performed in the following sequence: one-week preparation; one week of inspection; one week return to region for review, interim report writing, and adjustment to inspection plan; another week of inspection; and one week to write the inspection report. This inspection will be the heart of the aging management review and demonstration inspection. The second inspection should not begin until the "SER with open items" (currently scheduled for June 1999) is complete.

For the aging management review inspections, the inspector will verify that DEC's aging management programs and activities have been implemented completely, correctly, and consistent with the requirements of the rule, DECs' LRAs, the staff's review of the application as documented in the SER, and site-approved program and procedures.

a. Prior to the inspection preparation week, the team leader will review this inspection plan, the inspection report from the first inspection, and the LRA to assign various inspection activities to individual team members for detailed review during inspection preparation. The goal for assigning these inspection activities is to allow each inspection team member to become familiar with the scope of the inspection, and for each team member to prepare for their role in the inspection process.

- b. During preparation week, the team will review the necessary documentation. For the systems, structures, and commodity groups assigned to each inspector, the inspector will verify that DEC's aging management review and demonstration was implemented consistent with the rule, DEC's LRA, the staff's safety evaluation of the LRA, the Commission and staff approved guidance, and documented staff positions, as applicable.
- c. During the on-site inspection, the team will implement the inspection activities defined in Section IV.3, IV.4, IV.5 and IV.6 of this inspection plan.
- d. During the week following the second week of on-site inspection, the team members will submit their documented findings within the time specified by the team leader. The team leader will develop the final inspection report consistent with NRC guidance in inspection Manual Chapters.

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<u>Third Inspection</u> - The third inspection will primarily be used to follow-up on previous inspection activities and to inspect DEC actions relating to SER open items. This inspection should be performed about 30 days prior to final licensing action.

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- a. Prior to the inspection preparation week, the team leader will review this inspection plan, the inspection reports from the first two inspections, and input from the program office to assign various inspection activities to individual team members for detailed review during inspection preparation. The goal of this review will be to allow each inspection team member to become familiar with the scope of the inspection, and for each team member to prepare for their role in the inspection process.
- b. During preparation week, the team will review the necessary documentation to prepare for the scope of this inspection as agreed upon by Region II and the program office.
- c. Team members will perform the inspection activities as followup to address open items from previous inspection activities under Section IV, as assigned by the team leader. Other inspection activities, such as verifying the completion of SER open items or inspection follow-up items will be performed using standard inspection practices and/or existing inspection procedures, as applicable. Special instructions will be documented, as necessary.
- d. The staff's technical review of the LRA and resulting SER may result in specific inspection activities. PDLR will keep track of all required and recommended inspection activities resulting from the technical review. PDLR will provide the team with a list of these inspection activities and coordinate any clarification or discussions necessary to implement these activities. These inspection activities may be performed anytime throughout the inspection process. However, the third inspection will be used to verify that all required inspection activities are completed.
- e. Any followup items resulting from the first two inspections and any additional system, structural, component, or commodity group visual inspections, as arranged with DEC, will be performed during this inspection. In addition, any recommended visual inspection identified in one of the LRIP inspections can be performed by the resident or regional personnel at a later date if the component is not accessible during any of these inspections. The third inspection report should document the need for any specific future inspections and identify the steps that have been taken to coordinate any future inspections with DEC.
- f. Any inspection activities associated with enforcement items will be performed using standard inspection practices and/or existing inspection procedures, as applicable. Special instructions will be documented, as necessary.

7

As part of the above specified inspection activities for each of the three inspections, the inspection team will verify that the information and documentation required by, or otherwise necessary to document compliance with, the provisions of the rule are being maintained in an auditable and retrievable form wherever applicable throughout the inspection process.

#### **INSPECTION RESOURCES:**

The inspection resources will consist of the following positions and skills for the DEC inspections:

1. Inspectors - positions

- 1 Team leader
- 3 Regional based inspectors
- 1 Inspector with site-specific knowledge
  - 1 or more support staff from program office

2. Inspectors - skills - the inspection team needs a cross-section of skills including mechanical, material, civil and electrical engineering skills

The scope of the third inspection (and correspondingly, the resources) will be determined by the open issues, if any, from the previous inspection activities. Therefore the third inspection team will be made up of 3 to 6 inspectors with the skills determined necessary after the third inspection.

3. Resource Recommendations:

- 4 weeks of inspection
- 5-7 inspectors per inspection
- 1 week preparation per inspection
- 1 week on-site inspection
- 3 days report writing for each inspector
- 1 week for team leader to finalize the inspection report
- 1 week processing inspection report
- At least one inspection performed during an outage to allow the inspectors to inspect the material condition of the SCs within the scope of the rule

#### 4. Resource Estimates:

Inspection Resources -

6 inspectors x 4 inspection weeks x 2.6 weeks per inspection (1 week prep +1 week inspecting +3 days report writing) = 62.4 weeks

Training Resources - In addition to inspection activities, members of the inspection team will be trained on the rule and inspection procedures prior to beginning inspection activities.

2 PDLR staff members + 6 inspectors x 2 days/sessions = 16 person-days

Systems, Structures & Commodity Groups	Aging Effects	Aging Management Programs
Reactor Building (Containment) Structural	Loss of Material	Containment Inservice Inspection Plan (Examination Categories E-A, E-B, E-C, E-D, E-F, E-G, E-P and L-B)
Components Section 3.3 & Table 3.3-1)		Coating Program
		Containment Leak Rate Testing Program
- -	Cracking	Containment Inservice Inspection Plan (Examination Category L-A for Concrete)
	Change in Material Properties	Containment Inservice Inspection Plan (Examination Category L-A for Concrete)
Reactor Coolant System	Loss of Material	Boric Acid Wastage Surveillance Program
Components & Class 1 Supports (Section 3.4 &		Chemistry Control Program
Table 3.4-1)		Rx Coolant System Operational Leakage Monitoring
	· · · ·	Steam Generator Tube Surveillance Program
		Alloy 600 Aging Management Program
		Inservice Inspection Plan (Examination Categories B-G-1, B-H, B-N- 1, B-N-2,B-N-3, B-Q, B-P, C-H, and F-A)
		Inspection Program for Civil Engineering Structures and Components
	Cracking	Inservice Inspection Plan (Examination Categories B-G-1, B-A, B-B, B-D, B-E, B-F, B-H, B-J, B-L-1, B-L-2, B-N-1, B-N-2, B-N-3, B-O, B- P, B-Q, C-A, C-B, C-C, and C-H)
		Rx Coolant System Operational Leakage Monitoring
		Chemistry Control Program
		Alloy 600 Aging Management Program
		Small Bore Piping Inspections
		CRDM Nozzle and Other Vessel Closure Penetrations Inspection Program
		TLAA
·		Program to Inspect the HPI Connections to the RCS
		Pressurizer Examinations
•		Steam Generator Tube Surveillance Program
	· · · · · · · · · · · · · · · · · · ·	Rx Vessel Internals Aging Management Program
	Loss of Preload / Closure Integrity	Inservice Inspection Plan (Examination Categories B-G-1, B-G-2, B-N-3, B-O, B-P, and C-H)
		Rx Coolant System Operational Leakage Monitoring
	•	Rx Vessel Internals Aging Management Program
	Reduction of Fracture Toughness (CASS)	Chemistry Control Program

## Systems, Structures & Commodity Groups

Attachment 1

Systems, Structures & Commodity Groups	Aging Effects	Aging Management Programs
	Reduction of Fracture Toughness (CASS)	Chemistry Control Program
		Inservice Inspection Plan (Examination Categories B-L-1, B-L-2, B-M-2, B-N-3, and B-P)
		Rx Vessel Integrity Program
	Change in Material Properties of Lubrite Pads	OTSG Upper Lateral Support Inspections
	Mechanical Distortion	Inservice Inspection Plan (Examination Categories B-Q and B-P)
		Rx Coolant System Operational Leakage Monitoring
		Steam Generator Tube Surveillance Program
Reactor Building Spray	Loss of Material	Chemistry Control Program
System (Section 3.5.3.2 & Table 3.5-1)		Reactor Building Spray System Inspection
r	Cracking	Chemistry Control Program
		Reactor Building Spray System Inspection
Containment Isolation	Loss of Material	Chemistry Control Program
Systems - Component Cooling System (Section 3.5.4.2 & Table 3.5-2)	Cracking	Treated Water Systems Stainless Steel Inspection (one time inspection/verification)
Emergency Core Cooling System (ECCS) - Core Flood	Loss of Material	Chemistry Control Program
System (Section 3.5.5.1 & Table 3.5-3)	Cracking	Chemistry Control Program
Emergency Core Cooling	Loss of Material	Chemistry Control Program
System (ECCS) - High Pressure Injection System	Cracking ,	Chemistry Control Program
(Section 3.5.5.2 & Table 3.5- 3)		Rx Coolant System Operational Leakage Monitoring
Auxiliary Systems - Low Pressure Service Water	Loss of Material	Service Water Piping Corrosion Program
System (Section 3.5.6.5 &		System Performance Testing Activities
Table 3.5-4)		Preventive Maintenance Activities
•		Galvanic Susceptibility Inspection
		Chemistry Control Program
	Fouling	Service Water Piping Corrosion Program
· .		System Performance Testing Activities
Steam & Power Conversion Systems - Emergency	Loss of Material	Chemistry Control Program
Feedwater System (Section 3.5.9.3 & Table 3.5-7)	Cracking	Chemistry Control Program
Steam & Power Conversion	Loss of Material	Chemistry Control Program
Systems - Feedwater System (Section 3.5.9.4 & Table 3.5-7)		Piping Erosion/Corrosion Program

Table 3.5-7)

Attachment 1

Systems, Structures & Commodity Groups	Aging Effects	Aging Management Programs
	Cracking	Chemistry Control Program
Steam & Power Conversion	Loss of Material	Keowee Air and Gas System Inspection
Systems - Keowee Hydroelectric Station		Keowee Oil Sampling Program
(Section 3.5.13 & Table 3.5- 11)		Service Water Piping Inspection Program
		Fire Protection Program
		Galvanic Susceptibility Inspection
		Cast Iron Selective Leaching Inspection
		Preventive Maintenance Activities
		Service Water Piping Corrosion Program
	Fouling	Service Water Piping Inspection Program
		Fire Protection Program
		Fire Protection Program - Piping
		System Performance Testing Activities
		Preventive Maintenance Activities
Standby Shutdown Facility - Reactor Coolant Makeup System (Section 3.5.14.5 &	Loss of Material Cracking	Chemistry Control Program
Table 3.5-12)		
Electrical Components - Bus (Section 3.6.2 & Table 3.6-1)	None Identified <sup>2</sup>	None Required
Electrical Components -	None Identified <sup>2</sup>	None Required
Insulated Cables & Connections (Section 3.6.3 & Table 3.6-1)		
Structural Components -	Cracking	Inspection Program for Civil Engineering Structures and Components
Auxiliary Building (Section 3.7.3 & Table 3.7-1)		Chemistry Control Program
	Ç.	Fire Protection Program
	Loss of Material	Inspection Program for Civil Engineering Structures and Components
		Battery Rack Inspections
		Crane Inspection Program
· · ·		Inservice Inspection Plan (Category F-A)
		Chemistry Control Program

2

Inspection Team should during the Scoping Inspection pay extra attention to Electrical SCs. They were omitted during Scoping and Screening process

Attachment 1

Systems, Structures & Commodity Groups	Aging Effects	Aging Management Programs
		Fire Protection Program
	Separation	Fire Protection Program
Structural Components -	Loss of Material	Inspection Program for Civil Engineering Structures and Components
Intake Structure (Section 3.7.5 & Table 3.7-3)		Inservice Inspection Plan (Category F-A)
Structural Components - Keowee Structures (Section	Cracking	Inspection Program for Civil Engineering Structures & Components
3.7.6 & Table 3.7-4)	Loss of Material	Penstock Inspection
		FERC Five Year Inspection
• .		Duke Power Five-Year Underwater Inspection of Hydroelectric Dams and Appurtenances
		Inspection Program for Civil Engineering Structures & Components
		Crane Inspection
		Battery Rack Inspection
		Inservice Inspection Plan (Category F-A)
	Change in Material Properties	Duke Power Five-Year Underwater Inspection of Hydroelectric Dams and Appurtenances
		Penstock Inspection
		Inspection Program for Civil Engineering Structures & Components
		FERC Five Year Inspection
Structural Components -	Loss of Material	Inspection Program for Civil Engineering Structures & Components
Standby Shutdown Facility (SSF) (Section 3.7.8 & Table 3.7-6)		Battery Rack Inspections
		Crane Inspection Program
	·	Inservice Inspection Plan (Examination Category F-A)
	Cracking	Inspection Program for Civil Engineering Structures & Components
	,	

# Aging Effects

Aging Effects	Systems, Structures, Commodity Groups	Aging Management Programs
Loss of Material	Reactor Building (Containment)	Alloy 600 Aging Management Program
	Structural Components	Battery Rack Inspections
	Reactor Coolant System Components & Class 1 Supports	Boric Acid Wastage Surveillance Program
	Containment Isolation Systems -	Cast Iron Selective Leaching Inspection
•	Component Cooling System	Chemistry Control Program
	Emergency Core Cooling System (ECCS) - Core Flood System	Coating Program
	Emergency Core Cooling System (ECCS) - High Pressure Injection System	Containment Inservice Inspection Plan (Examination Categories E-A, E-B, E-C, E-D, E-F, E-G, E-P and L-B)
		Containment Leak Rate Testing Program
	Auxiliary Systems - Low Pressure Service Water System	Crane Inspection Program
	Steam & Power Conversion Systems - Emergency Feedwater System	Duke Power Five-Year Underwater Inspection of Hydroelectric Dams and Appurtenances
	Steam & Power Conversion Systems -	FERC Five Year Inspection
	Feedwater System	Fire Protection Program
	Steam & Power Conversion Systems - Keowee Hydroelectric Station	Galvanic Susceptibility Inspection
	Standby Shutdown Facility - Reactor Coolant Makeup System	Chemistry Control Program
	Structural Components - Auxiliary Building	Inservice Inspection Plan (Examination Categories B-G-1, B-H, B-N-1, B-N-2,B-N-3, B-Q, B-P, C-H, and F-A)
	Structural Components - Intake	Inservice Inspection Plan (Category F-A)
	Structure	Inspection Program for Civil Engineering Structures and Components
	Structural Components - Keowee Structures	Keowee Air and Gas System Inspection
	Structural Components - Standby	Keowee Oil Sampling Program
	Shutdown Facility (SSF)	Penstock Inspection
	Reactor Building Spray	Piping Erosion/Corrosion Program
	· · ·	Preventive Maintenance Activities
		Reactor Building Spray System Inspection
		Rx Coolant System Operational Leakage Monitoring
		Service Water Piping Corrosion Program
		Service Water Piping Inspection Program
		Steam Generator Tube Surveillance Program
		System Performance Testing Activities

Aging Effects	Systems, Structures, Commodity Groups	Aging Management Programs
Cracking	Reactor Building (Containment) Structural Components	Alloy 600 Aging Management Program
	Reactor Coolant System Components & Class 1 Supports Containment Isolation Systems -	Chemistry Control Program Containment Inservice Inspection Plan (Examination Category L-A for Concrete)
	Component Cooling System Emergency Core Cooling System	CRDM Nozzle and Other Vessel Closure Penetrations Fire Protection Program
	(ECCS) - Core Flood System Emergency Core Cooling System (ECCS) - High Pressure Injection System	Inservice Inspection Plan (Examination Categories B-G-1, B-A, B-B, B-D, B-E, B-F, B-H, B-J, B-L-1, B-L-2, B-N-1, B- N-2, B-N-3, B-O, B-P, B-Q, C-A, C-B, C-C, and C-H)
	Steam & Power Conversion Systems - Emergency Feedwater System	Inspection Program Inspection Program for Civil Engineering Structures and
	Steam & Power Conversion Systems - Feedwater System	Components Pressurizer Examinations
	Standby Shutdown Facility - Reactor Coolant Makeup System	Chemistry Control Program
	Structural Components - Auxiliary Building	Program to Inspect the HPI Connections to the RCS Reactor Building Spray System Inspection
	Structural Components - Keowee Structures	Rx Coolant System Operational Leakage Monitoring
	Structural Components - Standby Shutdown Facility (SSF)	Rx Vessel Internals Aging Management Program Small Bore Piping Inspections
	Reactor Building Spray	Steam Generator Tube Surveillance Program
		TLAA
		Treated Water Systems Stainless Steel Inspection (one time inspection/verification)
Loss of Preload / Closure Integrity	Reactor Coolant System Components & Class 1 Supports	Inservice Inspection Plan (Examination Categories B-G-1, B-G-2, B-N-3, B-O, B-P, and C-H)
		Rx Coolant System Operational Leakage Monitoring
		Rx Vessel Internals Aging Management Program
Reduction of Fracture Toughness (CASS)	Reactor Coolant System Components & Class 1 Supports	Chemistry Control Program
		Inservice Inspection Plan (Examination Categories B-L-1, B-L-2, B-M-2, B-N-3, and B-P)
		Rx Vessel Integrity Program

Aging Effects	Systems, Structures, Commodity Groups	Aging Management Programs
Change in Material Properties	Reactor Building (Containment) Structural Components	Containment Inservice Inspection Plan (Examination Category L-A for Concrete)
	Structural Components - Keowee Structures	Duke Power Five-Year Underwater Inspection of Hydroelectric Dams and Appurtenances
		FERC Five Year Inspection
		Inspection Program for Civil Engineering Structures and Components
	· · ·	Penstock Inspection
Mechanical Distortion	Reactor Coolant System Components & Class 1 Supports	Inservice Inspection Plan (Examination Categories B-Q and B-P)
		Rx Coolant System Operational Leakage Monitoring
· · · · · · · · · · · · · · · · · · ·		Steam Generator Tube Surveillance Program
Change in Material Properties of Lubrite Pads	Reactor Coolant System Components & Class 1 Supports	OTSG Upper Lateral Support Inspections
Fouling	Auxiliary Systems - Low Pressure	Fire Protection Program
	Service Water System	Fire Protection Program - Piping
	Steam & Power Conversion Systems - Keowee Hydroelectric Station	Preventive Maintenance Activities
	· · ·	Service Water Piping Corrosion Program
		Service Water Piping Inspection Program
		System Performance Testing Activities
Separation	Structural Components - Auxiliary Building	Fire Protection Program
None Identified	Electrical Components - Bus	None Required
	Electrical Components -Insulated Cables & Connections	

FSAR HP HVAC IPA IP IR LR LR LRA LRIP NSR ONS OTSG PAM PB RCS RX SBO SC SER SOC	Aging Management Review Age-Related Degradation Mechanism Anticipated Transient Without Scram Component Cooling Water Current Licensing Basis Control Rod Drive Mechanism Design Basis Event Duke Energy Corporation Emergency Core Cooling System Environmental Qualification Federal Energy Regulatory Commission Fire Protection Final Safety Analysis Report High Pressure Injection Heating, Ventilation and Air Conditioning Integrated Plant Assessment Inspection Procedure Issue Report License Renewal License Renewal Application License Renewal Inspection Program Non-Safety-Related Oconee Nuclear Station Once Through Steam Generator Post-Accident Monitoring Pressure Boundary Reactor Coolant System Reactor Station Blackout Structures and Components Safety Evaluation Report Statements of Consideration Safety-Related
SR	Safety-Related
SS	System and Structure
SSF	Standby Shutdown Facility
SSC	Systems, Structures and Components
SSCG	Systems, Structures and Commodity Groups
TLAA	Time-Limited Aging Analysis
UFSAR	Updated Final Safety Analysis Report
010/411	opulated I mai Salety Analysis Report

Attachment 2

#### Reference Material

The License Renewal Rule promulgated in Title 10, Part 54, of the Code of Federal Regulations revised May 8, 1995.

- The statement of consideration that accompanied the License Renewal Rule as published in the *Federal Register*, May 8, 1995.
- Draft Regulatory Guide DG-1047, entitled "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," issued August 1996.
- The "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 The License Renewal Rule," issued March 1996.
- The Inspection Manual Chapter 2516
- Inspection Procedures 71002
- ONS License Renewal Application, submitted July 6, 1998.
- The staff's Safety Evaluation relating to the ONS LRA.