

## **NRR-PMDAPEm Resource**

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**From:** Miller, Ed  
**Sent:** Tuesday, November 24, 2015 10:42 AM  
**To:** 'kay.crane@duke-energy.com'  
**Subject:** Request for Exemption from 10 CFR 74.19(c)  
**Attachments:** DRAFT RAI For McGuire Exemption from 10 CFR 74.19 .pdf

Kay,  
The NRC staff's draft RAI for the subject amendment is attached to this e-mail. The draft RAI is not an official NRC staff request and is being provided to you to facilitate a subsequent conference call to determine: 1) If the questions clearly convey the NRC staff information needs; 2) Whether the regulatory basis for the questions is understood; 3) Whether the information is already available in existing, docketed, correspondence; and 4) To determine an appropriate response time-frame. After you've had a chance to review the draft information request, please contact me to schedule the conference call. Please notify me by December 4, 2015, if you desire to hold a teleconference to discuss the question.

Ed Miller  
(301) 415-2481

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2508

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**From:** Miller, Ed

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**Recipients:**  
"kay.crane@duke-energy.com" <kay.crane@duke-energy.com>  
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**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
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REQUEST FOR ADDITIONAL INFORMATION  
OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO REQUEST FOR EXEMPTION FROM  
TITLE 10 OF THE CODE OF FEDERAL REGULATIONS PART 74.19(C)  
DUKE ENERGY CAROLINAS, LLC  
MCGUIRE NUCLEAR STATION, UNITS 1 AND 2  
DOCKET NOS. 50-369 AND 50-370

By letter dated August 17, 2015, as supplemented by letter dated October 6, 2015, Duke Energy Carolinas, LLC (Duke), requested the U.S. Nuclear Regulatory Commission (NRC) to authorize exemption from the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 74.19(c) for the McGuire Nuclear Station, Units 1 and 2. The exemption would allow an alternative to the physical inventory requirements for movable incore detectors.

The regulations in 10 CFR 74.19 specify recordkeeping requirements applicable to special nuclear material (SNM). In addition, the regulatory requirement in 10 CFR 74.19(c) stipulates that the licensee must conduct a physical inventory of all SNM in its possession under license at intervals not to exceed 12 months. The NRC staff has reviewed the request and has determined that the following additional information is necessary to enable the NRC staff to make an independent assessment regarding its technical review.

**RAI 1**

Provide a completion date for modifications to the incore storage sleeves to make the incore detectors within the storage sleeves inaccessible.

**RAI 2**

Provide an implementation date for modifications to ensure the incore detectors meet the requirements of inaccessibility.

**RAI 3**

Provide administrative procedures and controls to be established so that verification of the storage pipes shall be performed during refueling outages and that records concerning the location and unique identity of incore detectors are accurate

**RAI 4**

Explain the acronyms "2EOC23" and "1EOC24" used in the exemption request.