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ONS-2016-003

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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 and 2
Docket Numbers 50-269 and 50-270
Renewed License Numbers DPR-38 and DPR-47

Subject: Notification of Compliance with Order EA-12-051, "Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation" for Oconee Nuclear Station, Units 1 and 2

References:

1. NRC Order Number EA-12-051, Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012, ADAMS Accession No. ML12054A679.
2. Oconee Nuclear Station, Units 1, 2, and 3, Interim Staff Evaluation and Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated November 1, 2013 (Accession No. ML13298A696).
3. Oconee Nuclear Station, Units 1, 2, and 3 - Report for the Onsite Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Instrumentation Related to Orders EA-12-049 And EA-12-051 (TAC NOS. MF0782, 0783, 0784, 0785, 0786, AND 0787), dated October 6, 2015 (Accession No. ML15259A387).

Ladies and Gentlemen

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051, "Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation" (Reference 1). This Order was effective immediately and directed holders of operating reactor licenses to install reliable spent fuel pool instrumentation as outlined in Attachment 2 of the Order. This letter, along with its enclosures, provides the notification required by Section IV.C.3 of the Order that compliance with the requirements described in Attachment 2 of the Order has been achieved for Oconee Nuclear Station (ONS), Units 1 and 2.

(Note: The Order required that Unit 2 compliance be completed prior to restart from the refueling outage for end-of-cycle 27 (EOC27). However, since ONS has a common pool for Units 1 and 2, both units were implemented concurrently.)

On November 11, 2015, Unit 2 commenced start-up from the EOC27 refueling outage, which established the EA-12-051 Order compliance date for Units 1 and 2.

ADD
NRR


Attachment 1 provides a brief summary of the key elements associated with compliance to Order EA-12-051 for ONS Units 1 and 2. Open and pending items from the NRC Audit Report (Reference 3) are provided in Attachment 2 with a summary response for each item to support closure. As such, Duke Energy considers these items complete, pending NRC closure.

This letter contains no new or revised 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 January 20, 2016.

Sincerely,



Scott L. Batson
Vice President
Oconee Nuclear Station

Attachments:

1. Oconee Nuclear Station, Units 1 and 2, Summary of Compliance Elements for Order EA-12-051
2. Oconee Nuclear Station, Units 1 and 2, NRC Audit Report Open and Pending Items

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ATTACHMENT 1
Oconee Nuclear Station, Units 1 and 2
Summary of Compliance Elements for Order EA-12-051

BACKGROUND

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051, "Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation." This Order was effective immediately and directed holders of operating reactor licenses to install reliable spent fuel pool instrumentation as outlined in Attachment 2 of the Order. For Oconee, the Order requires Unit 2 compliance prior to plant startup from the end-of-cycle 27 (EOC27) outage. On November 11, 2015, Unit 2 commenced start-up from the EOC27 refueling outage, which established the Order compliance date for Unit 2. However, since ONS has a common pool for Units 1 and 2, both units were implemented concurrently. The information provided herein demonstrates compliance for Oconee Nuclear Station, Units 1 and 2 related to the Order.

COMPLIANCE SUMMARY FOR UNITS 1 AND 2

NRC RAI, ISE, and Audit Items - Complete

All Requests for Additional Information, ISE Open Items and Confirmatory Items, and Audit Questions/Open Items have been addressed and are considered complete pending NRC closure.

Identification of Levels of Required Monitoring - Complete

The three required level indications for monitoring SFP level have been established in compliance with Order EA-12-051 for ONS, Units 1 and 2. These levels are integrated into the site processes for monitoring SFP during Beyond Design Basis events, including response to loss of SFP inventory.

Instrument Design Features - Complete

The modifications to install the Spent Fuel Pool Level Instrumentation have been fully implemented on ONS Units 1 and 2 in accordance with the station design control process. The design complies with the requirements specified in the order and as described in NEI 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051" (Reference A10).

The instruments are arranged to provide reasonable protection against missiles. The instruments are mounted to retain design configuration during and following the maximum expected ground motion. The instruments are designed to be reliable at expected environmental and radiological conditions including extended periods when the SFP is at saturation. The instruments are independent of each other and have separate and diverse power supplies. The instruments are designed to maintain their designed accuracy following a power interruption and to allow routine testing and calibration.

The instrument display is readily accessible during postulated events and allows level information to be promptly available to decision makers.

Program Features - Complete

Operating and maintenance procedures for the Spent Fuel Pool Instruments for ONS Units 1 and 2 have been developed, and integrated with existing procedures. These procedures have been verified and are available for use in accordance with the site procedure control program.

Site processes have been established to ensure the Spent Fuel Pool Instruments are maintained at their design accuracy.

Training for ONS, Units 1 and 2 has been completed using the ONS Systematic Approach to Training (SAT) as recommended in NEI 12-02, Revision 1, Section 4.1.

ATTACHMENT 1
Oconee Nuclear Station, Units 1 and 2
Summary of Compliance Elements for Order EA-12-051

REFERENCES

- A1. NRC Order Number EA-12-051, Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012, (Accession No. ML12054A679).
- A2. Oconee Nuclear Station's 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).
- A3. Oconee Nuclear Station 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 29, 2013 (Accession No. ML13242A009).
- A4. Oconee Nuclear Station 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).
- A5. Oconee Nuclear Station 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).
- A6. Oconee Nuclear Station 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), dated February 27, 2015 (Accession No. ML15063A028).
- A7. Oconee Nuclear Station Fifth 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, 2015 (Accession No. ML15247A069).
- A8. Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051, dated March 26, 2014 (Accession No. ML14083A620).
- A9. 10CFR50.54(f), "Request for Information Pursuant to Title 10 of the Code of Federal Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force review of Insights from the Fukushima Dai-ichi Accident", Recommendation 9.3, dated March 12, 2012, (Accession No. ML12053A340)
- A10. NEI 12-02, Revision 1 "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation.'"
- A11. Oconee Nuclear Station, Units 1, 2, and 3, Interim Staff Evaluation and Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated November 1, 2013 (Accession No. ML13298A696).

ATTACHMENT 2

Oconee Nuclear Station Units 1 and 2, NRC Audit Report Open and Pending Items

Duke Energy contends that ONS, Units 1 and 2 is in full compliance with Order EA-12-051 as demonstrated by the docketed correspondences concerning this order. Briefly, the Request for Additional Information (RAI) items provided in the Spent Fuel Pool Level Instrumentation (SFPLI) ISE are complete for ONS, Units 1 and 2, pending NRC closure.

Duke Energy provides the following response for the Audit Report Open and Pending Items and considers them to be complete with respect to establishing compliance for ONS Units 1 and 2:

Item	Description	Summary Response
SFPI RAI-8-D	Please provide the results for the selected methods, tests and analyses used to demonstrate the qualification and reliability of the installed equipment in accordance with the order requirements.	<p>The SAT report was uploaded to the e-portal on 10/1/15 and the NRC has reviewed the report and found it satisfactory and closed item SRAI-8-D. See copy of email below.</p> <p>Sent: Tue 10/13/2015 11:40 AM From: Boska, John <John.Boska@nrc.gov> To: Jones, Dana Chandler; Haile, David Guill, Paul F</p> <p>Dana, We have reviewed the SFPI SAT report. We found it satisfactory and closed item SRAI-8-D in the SE Tracker file.</p> <p>John Boska Mitigation Strategies & SFP Instrumentation Project Manager, NRR/JLD/JOMB U.S. Nuclear Regulatory Commission</p>