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ONS-2016-047

May 26, 2016

10CFR50.90

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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

Subject: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines
(MRP-227-A); Submittal of Information to Resolve Licensee Action Item 6.

References:

1. License Amendment Request (LAR) for the Reactor Vessel Internals (RVI) Inspection Plan, Duke Energy Carolinas, LLC, dated November 8, 2010 [ML103140599].
2. NUREG-1723, "Safety Evaluation Report Related to the License Renewal of Oconee Nuclear Station, Units 1, 2, and 3," March 2000 [ML003695154].
3. NRC Safety Evaluation, "Oconee Nuclear Station, Units 1, 2, and 3, Issuance of Amendments Regarding Inspection Plan for Reactor Vessel Internals (TAC Nos. ME9024, ME9025, and ME9026)," dated June 19, 2015 [ML15050A671].

By letter dated November 8, 2010 (Ref. 1) and supplemented by letters dated September 1, 2011, June 28, 2012, March 28, 2013, April 18, 2013, September 27, 2013, November 29, 2013, March 20, 2014 (2 letters), April 23, 2014, and May 28, 2015, Duke Energy Carolinas, LLC (Duke Energy), submitted a LAR which requested Nuclear Regulatory Commission (NRC) approval of a Reactor Vessel Internals (RVI) inspection plan based on "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227- A)," published by the Electric Power Research Institute (EPRI). This LAR was submitted to satisfy a License Renewal (LR) commitment contained in Section 3.4.3.3 of Reference 2.

On June 19, 2015, the NRC issued a Safety Evaluation (SE) (Ref. 3) approving the LAR (Ref. 1); however, as noted as a condition of approval in Section 3.3.3 of the SE, the NRC specified that Duke Energy submit evaluation results of its' evaluation of MRP-227-A, Action Item #6, prior to May 31, 2016. This was a commitment made in an earlier

Attachment 3 to this letter contains proprietary information.
Withhold From Public Disclosure Under 10 CFR 2.390.
Upon removal of Attachment 3 this letter is uncontrolled.

ADD
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supplement to the LAR. Action item #6 requires justification for the continued operability of each of the inaccessible RVI components and, if necessary, a plan for the replacement of the components for NRC review and approval. This submittal contains the information associated with Action Item #6.

Attachments 1 and 3, are the non-proprietary and proprietary versions of the same document. The AREVA affidavit in Attachment 2 provides the basis for which the proprietary information may be withheld from public disclosure by the NRC pursuant to 10 CFR 2.390.

There are no commitments contained in this document. Any inquiries on this submittal should be directed to Stephen C. Newman, Lead Nuclear Engineer, ONS Regulatory Affairs Group, at (864) 873-4388.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 26, 2016.

Sincerely,



Scott L. Batson
Vice President
Oconee Nuclear Station

Attachments:

1. MRP-227-A Applicant/Licensee Action Item 6 Analysis for the Oconee Nuclear Station Units 1, 2, and 3 [ANP-3477NP (Rev. 0); Non-Proprietary].
2. AREVA Affidavit.
3. MRP-227-A Applicant/Licensee Action Item 6 Analysis for the Oconee Nuclear Station Units 1, 2, and 3 [ANP-3477P (Rev. 0); Proprietary].

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cc: (w/attachments)

Ms. Catherine Haney, Regional Administrator
U. S. Nuclear Regulatory Commission - Region II
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Mr. James R. Hall
Senior Project Manager
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U.S. Nuclear Regulatory Commission
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Mr. Eddy Crowe
NRC Senior Resident Inspector
Oconee Nuclear Site

Ms. Susan E. Jenkins, Manager
Radioactive & Infectious Waste Management
Division of Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull St.
Columbia, SC 29201

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ATTACHMENT 2

AREVA Affidavit

A F F I D A V I T

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Morris Byram. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in the topical draft report ANP-3477P, Revision 0, "MRP-227-A Applicant/Licensee Action Item 6 Analysis for the Oconee Nuclear Station Units 1,2, and 3," and referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c), and 6(d) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Monie E. Ruff

SUBSCRIBED before me this 4th
day of May, 2016.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

