



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 27, 2016

LICENSEE: Duke Energy Carolinas, LLC

FACILITY: Oconee Nuclear Station, Units 1, 2, and 3

SUBJECT: SUMMARY OF NOVEMBER 18, 2015, AND DECEMBER 15, 2015, MEETINGS WITH DUKE ENERGY CAROLINAS, LLC TO DISCUSS PROPOSED REQUEST FOR ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(z) FOR THE OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 (CAC NOS. MF7029, MF7030, AND MF7031)

On November 18, 2015, and December 15, 2015, Category 1 public meetings were held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Duke Energy Carolinas, LLC (Duke Energy or the licensee). The purpose of these meetings was to discuss a proposed request for alternative in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(z) for the Oconee Nuclear Station, Units 1, 2, and 3 (Oconee). The meeting notices and agendas, dated November 5, 2015, and December 3, 2015, are available in the Agencywide Documents Access and Management System (ADAMS) at Package Accession No. ML16166A405. A list of attendees for each meeting is enclosed. The licensee's slide presentations in support of the respective meetings can be found in the ADAMS package noted.

During the November 18, 2015, meeting, the licensee discussed its proposed request for alternative to the codes and standards requirements in 10 CFR 50.55a(h)(2), "*Protection systems*," which states, in part, that:

... For nuclear power plants with construction permits issued before January 1, 1971 [which includes Oconee], protection systems must be consistent with their licensing basis...

The requirement in 10 CFR 50.55a(z), "*Alternatives to codes and standards requirements*," states the following:

Alternatives to the requirements of paragraphs (b) through (h) of this section or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation... The applicant or licensee must demonstrate that:
(1) *Acceptable level of quality and safety*. The proposed alternative would provide an acceptable level of quality and safety; or (2) *Hardship without a compensating increase in quality and safety*. Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The licensee stated that it intends to submit this request for alternative to address, in part, the NRC staff's letter dated June 27, 2014,¹ which documents the results of a component design-basis inspection (CDBI) at Oconee (Inspection Report 05000269/2014007;

¹ ADAMS Accession No. ML14178A535

05000270/2014007; 05000287/2014007). In that inspection report, the CDBI team identified an unresolved item (URI) involving cable configurations in certain underground cable raceways that may not comply with the Oconee licensing basis, design basis, and NRC regulations and requirements. Based on this URI, the NRC Region II staff issued Task Interface Agreement (TIA) 2014-05 by memorandum dated October 16, 2014,² seeking technical support to determine whether or not the cable configuration in the noted underground raceways meets the existing Oconee licensing basis and design basis.

During the meeting, the licensee stated that the request would propose an alternative approach to the requirement that the Oconee licensing basis meet the Institute of Electrical and Electronics Engineers (IEEE) Standard 279-1971. The licensee further stated that this submittal would demonstrate that the proposed alternatives provide an acceptable level of quality and safety and that NRC approval would revise and clarify the Oconee licensing basis and allow for resolution of the nonconforming condition outlined in the URI.

The licensee stated that the proposed alternatives would be applied in the following areas:

- Keowee Underground Power Path (Trench 3)
- PSW Ductbank Manholes 1 through 5
- PSW Ductbank Manhole 6 (MH-6) and PSW Cable Spreading Area
- Keowee Mechanical Equipment Gallery

The specific proposed alternatives are outlined on pages 29 through 37 of the licensee's slide presentation. The licensee stated that the forthcoming submittal would demonstrate an acceptable level of quality and safety for the proposed alternatives based on several factors, including:

- modifications per accepted standards
- environmental factors
- aging management program
- risk significance
- cable crush and fault test results

During the meeting, the licensee discussed the factors listed above. Further details are provided in the licensee's presentation slides.

During the December 15, 2015, meeting, the NRC staff and the licensee discussed questions that the NRC staff raised regarding the cable crush and fault testing. The questions can be found in the ADAMS package noted above. The licensee stated that the test results would be used to support the acceptability of the proposed alternative and validate previous engineering evaluations regarding postulated fault propagation. The licensee also stated that the test parameters and setup were established to bound plant conditions. A general overview and a review of the results of the cable testing can be found in the licensee's presentation slides for this meeting.

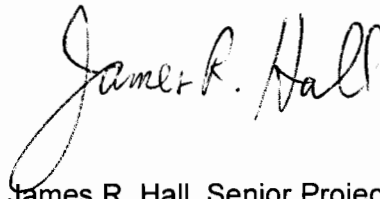
No regulatory decisions were made during these meetings.

² ADAMS Accession No. ML14290A136

One member of the public was in attendance for the December 15, 2015, meeting by teleconference. The member of the public had no questions or comments for the NRC staff. No public meeting feedback forms were received.

Duke Energy formally submitted the request for alternative by letter dated February 15, 2016.³ The submittal included responses to the NRC staff's questions transmitted by e-mail on December 8, 2015. The NRC staff notified the licensee that the request was accepted for review in an e-mail dated March 23, 2016.⁴ The results of the NRC staff's review of the request for alternative will be documented in a safety evaluation and transmitted to the licensee upon completion.

Please direct any inquiries regarding this matter to me at 301-415-4032 or by e-mail to randy.hall@nrc.gov.



James R. Hall, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-269, 50-270, and 50-287

Enclosures:

1. List of Attendees at
November 18, 2015, meeting
2. List of Attendees at
December 15, 2015, meeting

cc w/enclosures: Distribution via Listserv

³ ADAMS Accession No. ML16062A052

⁴ ADAMS Accession No. ML16083A370

LIST OF ATTENDEES

NOVEMBER 18, 2015, PRE-SUBMITTAL MEETING WITH DUKE ENERGY CAROLINAS, LLC

OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3

NRC	DUKE ENERGY	MEMBERS OF PUBLIC
Anne Boland	Scott Batson	
John Lubinski	Ed Burchfield	
Marissa Bailey	Chris Nolan	
Anthony Gody	Ray Price	
Jacob Zimmerman	Chris Wasik	
Michael Markley	Todd Grant	
Sunil Weerakkody	Steve Kimbrough	
Roy Mathew	Arthur Zaremba	
Gurcharan Matharu*	Steve Newman*	
Shavon Edmonds	Terry Patterson*	
Jeffrey Whited	Mike Leisure*	
Randy Hall	Jordan Vaughn*	
Michael Montecalvo		
Rick Ennis		
Margaret Chernoff		
Lynnea Wilkins		
Thomas Koshy		
Frank Ehrhardt*		
Jannette Worosilo*		
Theodore Fanelli*		

* Participated by teleconference

LIST OF ATTENDEES

DECEMBER 15, 2015, PRE-SUBMITTAL MEETING WITH DUKE ENERGY CAROLINAS, LLC

OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3

NRC	DUKE ENERGY	MEMBERS OF PUBLIC
Anne Boland	Ed Burchfield	Marvin Lewis*
Anthony Gody	Chris Nolan	
MaryJane Ross-Lee	Chris Wasik	
Jacob Zimmerman	Todd Grant	
Michael Markley	Arthur Zaremba	
Sunil Weerakkody	Vance Bowman	
See-Meng Wong	Bert Spear	
Nicholas Melly	Ryan Greco	
Jeffrey Mitman	Scott Batson*	
Jeffrey Whited	Terry Patterson*	
Randy Hall	Kerry Dutton*	
Michael Montecalvo	Ray Price*	
Harold Barrett		
Jonathan Bartley*		
Lynnea Wilkins		

* Participated by teleconference

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James R. Hall, Senior Project Manager /RA/
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2. List of Attendees at December 15, 2015, meeting

cc w/enclosures: Distribution via Listserv

DISTRIBUTION:

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SEdmonds, NRR	MChernoff, NRR	TKoshy, RES

ADAMS Accession Nos.: PKG ML16166A405 Summary: ML16166A402
11/18/15 Mtg.: Notice: ML15309A270 Slides: ML15321A178
12/15/15 Mtg.: Notice: ML15337A526 Questions: ML15343A114 Slides: ML15348A203

OFFICE	DORL/LPL2-1/PM	DORL/LPL2-1/LA	DORL/LPL2-1/BC	DORL/LPL2-1/PM
NAME	JWhited	LRonewicz	MMarkley (RMartin for)	JRHall
DATE	06/23/16	06/27/16	06/24/16	06/27/16

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⁵ ADAMS Accession No. ML16062A052

⁶ ADAMS Accession No. ML16083A370