



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

November 7, 2016

Mr. John Elnitsky
Senior Vice President
Nuclear Engineering
526 South Church Street
Mail Code EC07H / P.O. Box 1006
Charlotte, NC 28201-1006

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2; CATAWBA NUCLEAR STATION, UNITS 1 AND 2; MCGUIRE NUCLEAR STATION, UNITS 1 AND 2; SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1; AND H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 – RESULTS OF ACCEPTANCE REVIEW OF REQUESTED LICENSING ACTION REGARDING APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522, REVISION 0, USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CAC NOS. MF8422, MF8423, MF8424, MF8425, MF8426, MF8427, MF8428, AND MF8429)

Dear Mr. Elnitsky:

By letter dated September 27, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML 16273A042), Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (Duke Energy, or the licensee) submitted a license amendment request (LAR) for the Brunswick Steam Electric Plant, Units 1 and 2 (Brunswick); Catawba Nuclear Station, Units 1 and 2 (Catawba); McGuire Nuclear Power Plant, Unit 1 (McGuire); Shearon Harris Nuclear Power Plant, Unit 1 (Harris); and H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson).

The proposed amendments would modify technical specification (TS) requirements for certain ventilation systems with charcoal filters. The proposed changes are based on Technical Specification Task Force (TSTF) Traveler TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 Hours per Month" (ADAMS Accession No. ML100890316). The surveillance requirements would be revised to require operation of the systems for 15 continuous minutes each month, instead of 10 continuous hours each month. The licensee requested to adopt TSTF-522, Revision 0, using the consolidated line item improvement process (CLIP).

The purpose of this letter is to provide the results of the NRC staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plants.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the TSs) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of

10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your application. The following paragraphs provide the results of the NRC staff findings.

(A) Acceptance of LARs for Brunswick, Harris, and Robinson

The NRC staff has reviewed your application and concluded, with regard to Brunswick, Harris, and Robinson, that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendments in terms of regulatory requirements and the protection of public health and safety and the environment. The staff also concludes that the application regarding Brunswick, Harris, and Robinson may be processed as CLIIP amendments. Given the lesser scope and depth of the acceptance review, as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified, despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request regarding Brunswick, Harris, and Robinson may be processed as CLIIP amendments and will take approximately 500 hours to complete for these three sites. The NRC staff expects to complete this review in approximately 6 months. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date, or significant changes in the forecasted hours, the reasons for the changes, along with new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application, and they could change due to several factors, including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

(B) Supplemental Information Needed for Acceptance of LARs for Catawba and McGuire

The NRC staff has reviewed your application and concluded, with regard to Catawba and McGuire, that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding acceptability of the proposed amendments in terms of regulatory requirements and the protection of public health and safety and the environment. The LARs regarding Catawba and McGuire will not be accepted as CLIIP amendments until the necessary supplemental information is received.

In order to make the application complete, the NRC staff requests that Duke Energy supplement its application to address the information requested in the enclosure by November 28, 2016. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not

J. Elnitsky

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be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated timeframe in this letter were discussed with Mr. Arthur Zaremba of your staff on November 7, 2016.

If you have any questions, please contact me at (301) 415-3308 or by e-mail at Bhalchandra.vaidya@nrc.gov.

Sincerely,



Bhalchandra K. Vaidya, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-325, 50-324, 50-413,
50-414, 50-369, 50-370,
50-400, and 50-261

Enclosure:
Supplemental Information Needed

cc w/enclosure:

Mr. Robert T. Simril
Site Vice President
Duke Energy Carolinas, LLC
Catawba Nuclear Station
4800 Concord Road
York, SC 29745

Mr. Steven D. Capps
Vice President
Duke Energy Carolinas, LLC
McGuire Nuclear Station
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Mr. William R. Gideon, Site Vice President
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8470 River Rd. SE (M/C BNP001)
Southport, NC 28461

Ms. Tanya Hamilton
Site Vice President
Shearon Harris Nuclear Power Plant
5413 Shearon Harris Road, M/C HPP01
New Hill, NC 27562-0165

Mr. Richard M. Glover
Site Vice President
H. B. Robinson Steam Electric Plant
Duke Energy
3581 West Entrance Road, RNPA01
Hartsville, SC 29550

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SUPPLEMENTAL INFORMATION NEEDED
LICENSE AMENDMENT REQUEST TO ADOPT TSTF-522, REVISION 0
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS
DUKE ENERGY CAROLINAS, LLC
CATAWBA NUCLEAR STATION, UNITS 1 AND 2
MCGUIRE NUCLEAR STATION, UNITS 1 AND 2
DOCKET NOS. 50-413, 50-414, 50-369, AND 50-370

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The scope of the model safety evaluation for TSTF-522 was limited to the evaluation of the proposed changes to the surveillance requirements associated with certain ventilation filters. The model safety evaluation did not include an evaluation of changes to any other portion of the TSs. Section 2.2.2.e, regarding Catawba, and Section 2.2.3.f, regarding McGuire, of Attachment 1 of the LAR are associated with removing various ventilation system TS inoperability conditions and represent changes to TSs beyond the scope of TSTF-522. However, the licensee did not provide adequate justification for changes beyond the scope of TSTF-522.

The licensee should supplement its application to provide a complete discussion of the proposed removal of TS conditions that are out of scope for TSTF-522. The discussion should include a detailed design description of (1) the associated systems; (2) a description of any associated analyses for the systems, and whether or not the equipment mentioned in the conditions impact such analyses, and (3) a discussion that provides a justification for concluding that the TSs, as amended by the proposed changes, will still meet the regulatory requirements for TSs pursuant to Section 50.36, "Technical specifications," of Title 10 of the *Code of Federal Regulations*.

Enclosure

be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

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If you have any questions, please contact me at (301) 415-3308 or by e-mail at Bhalchandra.vaidya@nrc.gov.

Sincerely,

/RA/

Bhalchandra K. Vaidya, Project Manager
Plant Licensing Branch II-1
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ADAMS Accession No.: ML16308A370

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DATE	11/04/16	11/07/16	11/04/16	11/07/16	11/07/16

Letter to Mr. John Elnitsky from Mr. Bhalchandra K. Vaidya dated November 7, 2016

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2; CATAWBA NUCLEAR STATION, UNITS 1 AND 2; MCGUIRE NUCLEAR STATION, UNITS 1 AND 2; SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1; AND H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 – RESULTS OF ACCEPTANCE REVIEW OF REQUESTED LICENSING ACTION REGARDING APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522, REVISION 0, USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CAC NOS. MF8422, MF8423, MF8424, MF8425, MF8426, MF8427, MF8428, AND MF8429)

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