

**From:** Mahoney, Michael  
**Sent:** Tuesday, October 13, 2020 7:56 AM  
**To:** Sigmon, Chet Austin  
**Cc:** Art Zaremba  
**Subject:** Acceptance Review - Duke Fleet - RA-20-0191 - Request to Use a Provision of a Later Edition of the ASME B&PV Code, Section XI - IWA-5120, IWA-5213, IWA-5241, IWA-5242, and IWA-5250 (L-2020-LLR-0126)

Hi Chet,

By letter RA-20-0191, dated September 21, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20265A028), Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (Duke Energy, the licensee) submitted a relief request for Brunswick Steam Electric Plant, Units 1 and 2, Catawba Nuclear Station, Units 1 and 2, McGuire Nuclear Station, Units 1 and 2, Oconee Nuclear Station, Units 1, 2, and 3, H.B. Robinson Steam Electric Plant, Unit 3, and Shearon Harris Nuclear Power Plant, Unit 1. Duke Energy requested NRC approval to use specific provisions of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for Duke Energy Nuclear Fleet. Specifically, Duke Energy requests approval to use the ASME Boiler and Pressure Vessel Code, Section XI, 2017 Edition, Articles IWA-5120, IWA-5213, IWA-5241, IWA-5242, and IWA-5250 for pressure testing of Class 1, Class 2, and Class 3 systems.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (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 plant.

Pursuant to Section 50.55a, "Codes and standards," paragraph (g)(4)(iv), "Applicable [Inservice Inspection] ISI Code: Use of subsequent Code editions and addenda," of Title 10 of the *Code of Federal Regulations* (10 CFR) states: "Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met."

The NRC staff has reviewed your application and concluded 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 amendment in terms of regulatory requirements and the protection of public health and safety and the environment. 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 will take approximately 140 hours to complete. The NRC staff expects to

complete this review in approximately 5 months, which is February 2021. 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 the 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.

If you have any questions, please contact me.

Thanks

**Mike Mahoney**

Project Manager, LPL2-2

Division of Operating Reactor Licensing

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