



Steven M. Snider
Vice President
Oconee Nuclear Station

Duke Energy
ON01VP | 7800 Rochester Hwy
Seneca, SC 29672

o: 864.873.3478
f: 864.873.4208
Steve.Snider@duke-energy.com

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10 CFR 50.55a

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

OCONEE NUCLEAR STATION, UNIT NOS. 1, 2 AND 3
DOCKET NOS. 50-269, 50-270, AND 50-287 / RENEWED LICENSE NOS. DPR-38, DPR-47,
AND DPR-55

SUBJECT: Response to Request for Additional Information Regarding Alternative Request to Utilize American Society of Mechanical Engineers (ASME) Code Case OMN-28.

REFERENCES:

1. Duke Energy letter, *"Supplement to Relief Requests for Inservice Testing Plan – Sixth Interval,"* dated August 19, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21231A069)
2. NRC email, *"Oconee Nuclear Station, Units 1, 2, and 3 – Request for Additional Information RE: Alternative Request (ON-RPI-OMN-28) to use Code Case OMN-28 (EPID: L-2021-LLR-0054),"* dated September 30, 2021 (ADAMS Accession No. ML21273A049)

Ladies and Gentlemen:

By letter dated August 19, 2021 (Reference 1), Duke Energy Carolinas, LLC (Duke Energy) submitted alternative request ON-RPI-OMN-28 to the U.S. Nuclear Regulatory Commission (NRC). Specifically, Duke Energy requested NRC approval to utilize Code Case OMN-28 of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants (OM) Code, 2017 Edition for valves that fall under the appropriate category in the upcoming sixth ten-year Inservice Testing (IST) program interval for Oconee Nuclear Station (ONS), Units 1, 2, and 3.

By email dated September 30, 2021 (Reference 2) the NRC requested additional information to complete its review of alternative request ON-RPI-OMN-28. Enclosure 1 to this letter provides Duke Energy's response to the request for additional information (RAI).

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No new regulatory commitments have been made in this submittal. If you have additional questions, please contact Mr. Lee Grzeck, Manager (Acting) – Regulatory Affairs, at 980-373-1530.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven M. Snider". The signature is fluid and cursive, with the first name being the most prominent.

Steven M. Snider
Site Vice President
Oconee Nuclear Station

Enclosures:

1. Response to Request for Additional Information

cc:

L. Dudes, Regional Administrator USNRC Region II
J. Nadel, USNRC Senior Resident Inspector – ONS
S. A. Williams, NRR Project Manager – ONS

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Enclosure 1
Response to Request for Additional Information

NRC Request for Additional Information

By a letter dated July 29, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21210A341), as supplemented by a letter dated August 19, 2021 (ADAMS Accession No. ML21231A069), Duke Energy Carolinas, LLC (Duke Energy, the licensee) submitted to the U.S. Nuclear Regulatory Commission (NRC) Alternative Request ON-RPI-OMN-28 regarding certain inservice testing (IST) requirements of the American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code) for the IST Programs at Oconee Nuclear Stations, Units 1, 2, and 3 (Oconee) associated with the Sixth 10-Year IST Program interval. Specifically, pursuant to subparagraph (1) in paragraph (z), "Alternatives to codes and standards requirements," of Section 55a, "Codes and standards," in Part 50, "Domestic Licensing of Production and Utilization Facilities," in Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR 50.55a(z)(1)), the licensee requested to implement ASME OM Code Case OMN-28, "Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation," for certain valves at Oconee on the basis that the alternative provides an acceptable level of quality and safety.

The U.S. Nuclear Regulatory Commission staff has determined that additional information is needed as provided below. A clarification call to ensure mutual understanding was conducted on September 16, 2021.

Please respond within 45 days of the date of this e-mail.

RAI No. 1

Alternative Request ON-RPI-OMN-28 proposes that specific valves at Oconee deviate from the position verification requirements (referred to as PI requirements) of the ASME OM Code, Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants," Subsection ISTC, paragraph ISTC-3700, "Position Verification Testing." Please provide the list of valves that is within the scope of Alternative Request ON-RPI-OMN-28. This information may be provided by submittal of the Sixth 10-Year IST Program Plan for Oconee, or by submittal of separate listing of valves with PI requirements for the Sixth 10-Year IST Program interval.

Duke Energy Response

The tables below provide the list of valves that are within the scope of Alternative Request ON-RPI-OMN-28.

BS, BUILDING SPRAY (All Units)

Component ID
1BS-1
1BS-2
1BS-3
1BS-4
2BS-1
2BS-2
2BS-3
2BS-4
3BS-1
3BS-2
3BS-3
3BS-4

C, CONDENSATE (All Units)

Component ID
1C-156
1C-158
1C-160
1C-391
1C-903
1C-904
1C-906
1C-907
2C-156
2C-158
2C-160
2C-391
2C-903
2C-904
2C-906
2C-907
3C-156
3C-158
3C-160
3C-391
3C-903
3C-904
3C-906
3C-907

CF, CORE FLOOD SYSTEM (All Units)

Component ID
1CF-1
1CF-2
1CF-3
1CF-4
1CF-5
1CF-6
2CF-1
2CF-2
2CF-3
2CF-4
2CF-5
2CF-6
3CF-1
3CF-2
3CF-3
3CF-4
3CF-5
3CF-6

ESV, ESSENTIAL SIPHON VACUUM (All Units)

Component ID
1ESV-28
1ESV-29
2ESV-28
2ESV-29
3ESV-28
3ESV-29

FDW, FEEDWATER (Unit 1)

Component ID
1FDW-32
1FDW-35
1FDW-41
1FDW-44
1FDW-103
1FDW-104
1FDW-106
1FDW-108
1FDW-315
1FDW-316
1FDW-347
1FDW-368
1FDW-369
1FDW-372
1FDW-382

FDW, FEEDWATER (Unit 2)

Component ID
2FDW-32
2FDW-35
2FDW-41
2FDW-44
2FDW-103
2FDW-104
2FDW-106
2FDW-108
2FDW-315
2FDW-316
2FDW-347
2FDW-368
2FDW-369
2FDW-372
2FDW-382

FDW, FEEDWATER (Unit 3)

Component ID
3FDW-32
3FDW-35
3FDW-41
3FDW-44
3FDW-103
3FDW-104
3FDW-106
3FDW-108
3FDW-315
3FDW-316
3FDW-347
3FDW-368
3FDW-369
3FDW-372
3FDW-382

GWD, GASEOUS WASTE DISPOSAL (All Units)

Component ID
1GWD-17
2GWD-17
3GWD-17

HPI, HIGH PRESSURE INJECTION (Unit 1)

Component ID
1HP-23
1HP-24
1HP-25
1HP-26
1HP-27
1HP-98
1HP-115
1HP-139
1HP-140
1HP-398
1HP-409
1HP-410
1HP-939
1HP-940

HPI, HIGH PRESSURE INJECTION (Unit 2)

Component ID
2HP-23
2HP-24
2HP-25
2HP-26
2HP-27
2HP-98
2HP-115
2HP-139
2HP-140
2HP-398
2HP-409
2HP-410
2HP-939
2HP-940

HPI, HIGH PRESSURE INJECTION (Unit 3)

Component ID
3HP-23
3HP-24
3HP-25
3HP-26
3HP-27
3HP-98
3HP-115
3HP-139
3HP-140
3HP-398
3HP-409

3HP-410
3HP-939
3HP-940

LPI, LOW PRESSURE INJECTION (Unit 1)

Component ID
1LP-1
1LP-2
1LP-3
1LP-5
1LP-6
1LP-7
1LP-8
1LP-9
1LP-10
1LP-11
1LP-12
1LP-13
1LP-14
1LP-15
1LP-16
1LP-17
1LP-18
1LP-19
1LP-20
1LP-21
1LP-22
1LP-69
1LP-103
1LP-104
1LP-105

LPI, LOW PRESSURE INJECTION (Unit 2)

Component ID
2LP-1
2LP-2
2LP-3
2LP-5
2LP-6
2LP-7
2LP-8
2LP-9
2LP-10
2LP-11
2LP-12
2LP-13
2LP-14
2LP-15

2LP-16
2LP-17
2LP-18
2LP-19
2LP-20
2LP-21
2LP-22
2LP-69
2LP-103
2LP-104

LPI, LOW PRESSURE INJECTION (Unit 3)

Component ID
3LP-1
3LP-2
3LP-3
3LP-5
3LP-6
3LP-7
3LP-8
3LP-9
3LP-10
3LP-12
3LP-14
3LP-15
3LP-16
3LP-17
3LP-18
3LP-19
3LP-20
3LP-21
3LP-22
3LP-92
3LP-93
3LP-103
3LP-104

LPSW, LOW PRESSURE SERVICE WATER (Unit 0, Unit 1)

Component ID
LPSW-1
LPSW-2
LPSW-3
1LPSW-4
1LPSW-5
1LPSW-6
1LPSW-15
1LPSW-16
1LPSW-18

1LPSW-19
1LPSW-21
1LPSW-22
1LPSW-24
1LPSW-139
1LPSW-1121
1LPSW-1122
1LPSW-1123
1LPSW-1124
1LPSW-1150
1LPSW-1151

LPSW, LOW PRESSURE SERVICE WATER (Unit 2)

Component ID
2LPSW-4
2LPSW-5
2LPSW-6
2LPSW-15
2LPSW-16
2LPSW-18
2LPSW-19
2LPSW-21
2LPSW-22
2LPSW-24
2LPSW-139
2LPSW-1121
2LPSW-1122
2LPSW-1123
2LPSW-1124
2LPSW-1150
2LPSW-1151

LPSW, LOW PRESSURE SERVICE WATER (Unit 3)

Component ID
3LPSW-4
3LPSW-5
3LPSW-6
3LPSW-15
3LPSW-16
3LPSW-18
3LPSW-19
3LPSW-21
3LPSW-22
3LPSW-24
3LPSW-120
3LPSW-123
3LPSW-139
3LPSW-1121

3LPSW-1122
3LPSW-1123
3LPSW-1124
3LPSW-1150
3LPSW-1151

MS, MAIN STEAM (Unit 1)

Component ID
1MS-17
1MS-24
1MS-26
1MS-33
1MS-35
1MS-36
1MS-76
1MS-79
1MS-82
1MS-84
1MS-93
1MS-102
1MS-103
1MS-104
1MS-105

MS, MAIN STEAM (Unit 2)

Component ID
2MS-17
2MS-24
2MS-26
2MS-33
2MS-35
2MS-36
2MS-76
2MS-79
2MS-82
2MS-84
2MS-93
2MS-102
2MS-103
2MS-104
2MS-105

MS, MAIN STEAM (Unit 3)

Component ID
3MS-17
3MS-24
3MS-26
3MS-33
3MS-35
3MS-36
3MS-76
3MS-79
3MS-82
3MS-84
3MS-93
3MS-102
3MS-103
3MS-104
3MS-105

PSW, PROTECTED SERVICE WATER (Unit 1, 2, 3)

Component ID
PSW-14
1PSW-22
1PSW-23
1PSW-24
1PSW-25
1PSW-6
2PSW-22
2PSW-23
2PSW-24
2PSW-25
2PSW-6
3PSW-22
3PSW-23
3PSW-24
3PSW-25
3PSW-6

RCS, REACTOR COOLANT SYSTEM (Unit 1, 2, 3)

Component ID
1RC-1
1RC-4
1RC-155
1RC-156
1RC-157
1RC-158
1RC-159
1RC-160

1RC-162
1RC-163
2RC-1
2RC-4
2RC-155
2RC-156
2RC-157
2RC-158
2RC-159
2RC-160
2RC-162
2RC-163
3RC-1
3RC-4
3RC-155
3RC-156
3RC-157
3RC-158
3RC-159
3RC-160
3RC-162
3RC-163

SF, SPENT FUEL SYSTEM (Units 1, 2, 3)

Component ID
SF-166
SF-167
3SF-166
3SF-167

SSW, SIPHON SEALING WATER (Units 1, 2, 3)

Component ID
1SSW-155
1SSW-156
1SSW-157
2SSW-155
2SSW-156
2SSW-157
3SSW-155
3SSW-156
3SSW-157

WL, TURBINE GENERATOR COOLING WATER (Units 1, 2, 3)

Component ID
K1WL-11
K2WL-11