

# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 10, 2022

LICENSEES: Duke Energy Progress, LLC and Duke Energy Carolinas, LLC

Catawba Nuclear Station, Units 1 and 2; H. B. Robinson Steam Electric Plant, Unit 2; McGuire Nuclear Station, Units 1 and 2; Oconee Nuclear Station, Units 1,

2, and 3; and Shearon Harris Nuclear Power Plant, Unit 1

SUBJECT: SUMMARY OF APRIL 20, 2022, MEETING WITH DUKE ENERGY PROGRESS,

LLC, TO DISCUSS PROPOSED LICENSE AMENDMENT REQUEST TO REVISE REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVE OPERATIONAL LEAKAGE SURVEILLANCE REQUIREMENT FREQUENCY

(L-2022-LRM-0031)

On April 20, 2022, an observation public meeting was held virtually between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Duke Energy Progress, LLC (the licensee) via teleconference. The purpose of the meeting was to discuss a proposed license amendment request (LAR) to revise the plant-specific technical specifications related to the reactor coolant system pressure isolation valve operational leakage surveillance requirement frequency for several of the licensee's nuclear power plants. The meeting notice and agenda, dated April 8, 2022, are available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML22109A231. A list of attendees is enclosed.

The licensee presented informational slides at the meeting (ML22109A212) regarding the description of the planned change, applicable regulatory requirements and guidance, the licensee's evaluation approach, precedent, and schedule. The following are items for the licensee to consider for ensuring the submittal is complete:

- Confirm the applicability of American Society of Mechanical Engineers (ASME)
   Operation and Maintenance (OM) Code Case OMN-23, "Alternative Rules for Testing
   Pressure Isolation Valves," as referenced in the licensee's presentation, to the specific
   OM Code of Record being implemented at each nuclear power plant within the scope of
   the planned LAR, based on the ASME OM Code Case Applicability Index located on the
   ASME OM Committee website.
- Consider the proposed Technical Specification changes based on the implementation of the program under Section 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors," in Title 10, "Energy," of the Code of Federal Regulations (10 CFR 50.69) at the applicable nuclear power plants within the scope of the planned LAR.
- Describe how the Surveillance Frequency Control Program frequency is adequately replaced by requirements in the inservice testing program. This is related to the issue regarding 10 CFR 50.69 above.

 Describe how the proposed changes in the technical specifications for Surveillance Frequency Control Program and Inservice Testing Program are related to NEI 04-10, "Risk-Informed Method of Control of Surveillance Frequency," Revision 1, and implemented TSTF-425, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b."

Regarding the applicability of the OMN-23 Code Case, the licensee clarified that the proposed request is not necessarily impacted by the applicability of this Code Case to the current Inservice Testing Program Plan interval for each site. For instance, applicability of the OMN-23 is for the 2020 Edition of the ASME Code. Harris would have to either request relief or wait for the next interval program plan to be issued, in which case only then could OMN-23 be used by the site. In the meantime, the site would still be obligated to the current 2-year frequency specified by the current Code interval for each respective site. In discussing OMN-23 during the presentation, the licensee used it as an example of the direction in which the industry is moving regarding this particular testing, and the current limitations written into the technical specifications that limit the ability to extend the frequency in accordance with other NRC-approved code cases. Application of OMN-23 would be outside the scope of this LAR.

With respect to the schedule for the LAR, the licensee anticipated submittal of the LAR on May 19, 2022, with a requested approval within 1 year of acceptance under normal review priority.

No comments or public meeting feedback were received. No regulatory decisions were made at this meeting.

Please direct any inquiries to me at 301-415-8480, or <a href="mailto:Andrew.Hon@nrc.gov">Andrew.Hon@nrc.gov</a>.

Andrew Hon, Project Manager Plant Licensing Branch II-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket Nos.: 50-413, 50-414, 50-261, 50-369,

50-370, 50-269, 50-270, 50-287,

50-400

Enclosure: List of Attendees

cc w/ enclosure: Listserv

# **LIST OF ATTENDEES**

# APRIL 20, 2022, MEETING WITH DUKE ENERGY PROGRESS, LLC, TO DISCUSS PROPOSED LICENSE AMENDMENT REQUEST TO REVISE REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVE OPERATIONAL LEAKAGE SURVEILLANCE REQUIREMENT FREQUENCY (L-2022-LRM-0031)

# U.S. Nuclear Regulatory Commission

Andy Hon Thomas Scarbrough Gurigendra Bedi Stephen Smith Victor Cusumano Ian Tseng

### **Duke Energy**

Lee Grzeck Dennis Earp David Dobson

### Member of the Public

Jeff Mittman

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(L-2022-LRM-0031) DATED MAY 10, 2022

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NAME	AHon	RButler	DWrona	AHon
DATE	05/09/2022	05/09/2022	05/10/2022	05/10/2022

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