

**From:** [Wu, Angela](#)  
**To:** [Guill, Paul E](#); [Gambrell, Reese](#)  
**Cc:** [Johnson, Marieliz](#)  
**Subject:** Oconee SLRA - RAI 4.6.1-1a - NRC Staff Comments  
**Date:** Monday, April 25, 2022 10:19:00 AM

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Hello Paul & Reese,

Please see below for the staff's comments on RAI 4.6.1-1a:

1. The RAI number should be **4.6.1-1a**, and not B4.6.1-1a stated in several places in the ePortal response.
2. The response states "The material used for the fatigue exemption evaluation is SA-516 Grade 70 ..." and that "[t]he evaluation bounds the containment liner plate and cold penetrations that are part of the Oconee Units." Provide justification of why the fatigue exemption evaluation (of all six criteria) based on SA516 Grade 70 material is bounding of components with all other liner plate and cold penetration materials of construction listed in Table 4.6.1-1, OR alternatively evaluate each component material separately.
3. Wherever the response states "**106** cycles", (e.g., criteria b, d, e, f) it should read "**10<sup>6</sup>** cycles" or "**1000000** cycles". In discussion of criteria (b), "Therefore, **106** normal pressure cycles would have to..." should read "Therefore, **10<sup>6</sup>** normal pressure cycles **fluctuations** would have to...." For criteria (b), also address the additional case of pressure fluctuations as a result of Type A tests (claimed to be considered in SLRA 4.6.1 as amended by response to RAI 4.6.1-1), which is expected to be greater than the normal pressure fluctuations stated in the response of -2.45 to 1.2 psig.
4. As stated in the followup RAI 4.6.1-1a alternative request, in the response provide reference to the calculation # that documents the described fatigue exemption evaluation, or provide the calculation on the ePortal for staff verification that a calculation exists.

I'll be expanding our public meeting agenda on Thursday, 4/28 to include this topic.

Thanks!  
Angela