

**From:** [Williams, Shawn](#)  
**To:** [Treadway, Ryan I](#)  
**Cc:** [Vaughan, Jordan L](#)  
**Subject:** Oconee Nuclear Station, Units 1, 2, and 3 - Acceptance of Requested Licensing Action RE: Proposed Alternative to Use ASME Code Case N-752  
**Date:** Tuesday, August 23, 2022 10:40:06 AM

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Mr. Treadway,

By letter dated July 27, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22208A031), Duke Energy Carolinas, LLC, (the licensee, Duke Energy) submitted an alternative request for Oconee Nuclear Station, Units 1, 2, and 3, and the Keowee Hydro Station, Units 1 and 2. Specifically, Duke Energy is requesting to use the alternative requirements of ASME Code Case N-752, "Risk-Informed Categorization and Treatment for Repair/Replacement Activities in Class 2 and 3 Systems Section XI, Division 1," for determining the risk-informed categorization and for implementing alternative treatment for repair/replacement activities on moderate and high energy Class 2 and 3 items in lieu of certain ASME Code Section XI, paragraph IWA-1000, IWA-4000, and IWA-6000 requirements. Duke Energy submitted the request pursuant to Section 50.55a(z) (1) of Title 10 of the *Code of Federal Regulations*, which requires the applicant to demonstrate that the proposed alternative would provide an acceptable level of quality and safety. The NRC staff notes that if the alternative request is approved, it would be approved under the Oconee operating licenses, Units 1, 2, and 3, and only apply to the Keowee Hydro Station, Units 1 and 2, as applicable per the Oconee licensing basis.

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 proposed alternative. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to begin its detailed technical review. The acceptance review is also intended to identify whether the request has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to begin its detailed technical review and make an independent assessment regarding the acceptability of the proposed request 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 in despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 190 hours to complete. The NRC staff expects to complete this review by May 26, 2023. 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 can change due to several factors including requests for additional information,

and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact Shawn Williams at (301) 415-1009 or [Shawn.Williams@nrc.gov](mailto:Shawn.Williams@nrc.gov).

Shawn Williams, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-269, 50-270, 50-287

cc: Listserv