From:	Williams, Shawn
To:	Treadway, Ryan I
Cc:	Vaughan, Jordan L
Subject:	Oconee Nuclear Station, Units 1, 2, and 3 - Request for Additional Information RE: Additional mode change limitations applicable to the adoption of Technical Specifications Tasks Force Traveler (TSTF) No. 359, Revision 9 (EPID L-2022-LLA-0050)
Date:	Thursday, September 08, 2022 1:58:01 PM

Dear Mr. Treadway,

By letter dated March 31, 2022 (Agencywide Documents Access and Management System Accession No. ML22090A090), Duke Energy Carolinas, LLC, submitted a license amendment to revise Technical specifications (TS) for Oconee Nuclear Station, Units 1, 2, and 3 (ONS). The proposed amendment would revise ONS TS to address additional mode change limitations applicable to the adoption of Technical Specifications Tasks Force (TSTF) Traveler No. 359, Revision 9, "Increase Flexibility in Mode Restraints" (ML031190607) per Amendment Numbers 417, 419, and 418 to Renewed Facility Operating Licenses for ONS Units 1, 2, and 3, respectively (ML20237F435).

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 1, 2022.

Please respond within 30 days of the date of this e-mail.

Please note that the NRC staff's review is continuing and further requests for information may be developed. If you have any questions, please contact Shawn Williams at 301-415-1009 or via e-mail at Shawn.Williams@nrc.gov.

Sincerely,

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, and 50-287

cc: Listserv

RAI No. 1

In the Technical Evaluation of the proposed change on Page 4 of 7 in the application, the licensee states:

> "The ONS TS identified in Section 2.2 above are plant-specific TS that are not contained in NUREG-1430 and, therefore, were not included in the NUREG-1430 mark-ups provided in TSTF-359. Additionally, the identified systems and components are not considered higher-risk systems per the industry owners groups analyses provided in TSTF-359."

The TSTF-359 Notice of Availability (NOA) (68 FR 16579) dated April 4, 2003, states:

> "Those licensees opting to apply for the subject change to technical specifications are responsible for reviewing the staff's evaluation, referencing the applicable technical justifications, and **providing any necessary plant-specific information**." [**Emphasis added**]

The model SE in the NOA states:

> "TS systems and components which may be of higher risk during mode changes have been identified generically by each owner's group for each plant operational mode or condition. **Licensees will identify such plant-specific systems and components in the individual plant TS. The proposed LCO 3.0.4(b) allowance does not apply to these systems and components for the mode or condition in the applicability of an LCO at which they are of higher risk**." [**Emphasis added**]

In the approved TSTF-359 traveler, the B&WOG "Qualitative Risk Assessment for Increased Flexibility in MODE Restraints" states:

> "The objective of this evaluation is to perform a qualitative risk assessment that focuses on STS delineated systems required to be operable prior to changing modes during a return to power from a plant shutdown. Performance of the qualitative assessment is based on a return to power operations following a plant shutdown. The results of this assessment are presented in terms of STS required systems that are more important during Modes 5,4, 3, and 2 than during at-power operations, i.e., Mode 1."

Based on the above, the qualitative risk assessment performed by the B&WOG only accounts for SSCs in the STS and does not account for plant-specific systems. Please provide the results and a description of the plant-specific technical evaluation or a qualitative evaluation concluding that the systems in ONS's LAR are not higher risk systems or components.