

From: [Shawn Williams](#)
To: [Treadway, Ryan I](#)
Cc: [Sigmon, Chet Austin](#); [Vaughan, Jordan L](#)
Subject: Duke Fleet - Request for Additional Information RE: Proposed License Amendment Request to Revise Restrictive Surveillance Requirement Frequencies (EPID L-2023-LLA-0015)
Date: Friday, June 2, 2023 3:28:46 PM
Attachments: [Duke Fleet LAR SR Frequency RAI.pdf](#)

Dear Mr. Treadway,

By letter dated February 11, 2023 (Agencywide Document Access and Management System Accession Number ML23032A162), Duke Energy Carolinas, LLC (the licensee) submitted a proposed alternative to the inservice inspection requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, regarding Pressurizer Pressure-Retaining Welds and Full-Penetration Welded Nozzles for Catawba Nuclear Generation Station Units 1 and 2; McGuire Nuclear Station Units 1 and 2; Oconee Nuclear Station Units 1, 2, and 3; Shearon Harris Nuclear Power Plant Unit 1, and H.B. Robinson Steam Electric Plant Unit 2.

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 May 30, 2023.

Please respond by July 17, 2023. 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.

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,
50-413, 50-414, 50-369,
50-370, 50-400, 50-261

cc: Listserv

REQUEST FOR ADDITIONAL INFORMATION
REGARDING LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION

SURVEILLANCE REQUIREMENT FREQUENCIES

DUKE ENERGY

CATAWBA NUCLEAR STATION, UNITS 1 AND 2

DOCKET NOS. 50-413 AND 50-414

MCGUIRE NUCLEAR STATION, UNITS 1 AND 2

DOCKET NOS. 50-369 AND 50-370

OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3

DOCKET NOS. 50-269, 50-270, AND 50-287

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

DOCKET NO. 50-400

References

1. Letter from Duke Power to Nuclear Regulatory Commission (NRC), License Amendment Request to Revise Restrictive Technical Specification (TS) Surveillance Requirement (SR) Frequencies for the various Duke Power plants, dated February 1, 2023 (ADAMS Accession No. ML23032A162).
2. Inservice Testing Program for the Fourth 10-Year Interval for the Catawba Nuclear Station (CNS), Units 1, and 2 (ADAMS Accession No. MLML16299A278).
3. Inservice Testing Program for the Fourth 10-Year Interval for the McGuire Nuclear Station (MNS), Units 1, and 2 (ADAMS Accession No. ML13078A009).
4. Inservice Testing Program for the Fifth 10-Year Interval for the Oconee Nuclear Station (ONS), Units 1, 2, and 3 (ADAMS Accession No. ML12195A321).
5. Inservice Testing Program for the Fifth 10-Year Interval for the Robinson Steam Electric Plant (RNP), Unit 2 (ADAMS Accession No. ML12086A067).
6. Inservice Testing Program for the Fourth 10-Year Interval for the Harris Nuclear Plant (HNP), Unit 1 (ADAMS Accession No. ML17117A702).

7. Oconee Nuclear Station, Units 1, 2, and 3, Delay of Planned End Date for Fifth 10-Year Interval IST Program. The Fifth 10-Year Interval IST Program end date to June 30, 2023, versus the previously scheduled June 30, 2022, end date. Based on this new end date for the Fifth 10-Year Interval IST Program, the Sixth 10-Year Interval IST Program will now begin on July 1, 2023, and end on June 30, 2032 (ML22173A212).

Regulatory Requirements

The NRC regulations in 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) in paragraph (z), "Alternatives to codes and standards requirements," state the following:

Alternatives to the requirements of paragraphs (b) through (h) of this section or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation. A proposed alternative must be submitted and authorized prior to implementation. The applicant or licensee must demonstrate that:

(1) *Acceptable level of quality and safety.* The proposed alternative would provide an acceptable level of quality and safety; or

(2) *Hardship without a compensating increase in quality and safety.* Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

RAI No. 1

In the submitted LAR for CNS Units 1 and 2, ONS Units 1, 2 and 3, RNS, HNP and MNP Units 1 and 2, the licensee proposed technical specifications (TSs) changes for Reactor Coolant System (RCS) Pressure Isolation Valves (PIVs) surveillance frequencies to the "Inservice Service Testing (IST)." Please clarify whether all these PIVs are currently in the plants' IST Programs and whether any requirements are being added or removed for these valves as part of the proposed TS changes. Also, provide the IST frequencies of these plants' RCS PIVs.

NRC Staff Observation

In the LAR, Attachment 2, "Proposed Technical Specification Bases Changes (mark-up)," CNP, ONP and MNP SR 3.4.14.1, third paragraph on page B3.4.14-4 mark-up states:

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the ~~Surveillance Frequency Control Program~~ INSERVICE TESTING PROGRAM.

This description appears more appropriate for the Surveillance Frequency Control Program than for the IST program, particularly the statement regarding plant risk.