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10 CFR 50.90

July 7, 2023
Serial: RA-23-0142

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

CATAWBA NUCLEAR STATION, UNITS 1 AND 2
DOCKET NOS. 50-413 AND 50-414 / RENEWED LICENSE NOS. NPF-35 AND NPF-52

MCGUIRE NUCLEAR STATION, UNITS 1 AND 2
DOCKET NOS. 50-369 AND 50-370 / RENEWED LICENSE NOS. NPF-9 AND NPF-17

OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3
DOCKET NOS. 50-269, 50-270, AND 50-287 / RENEWED LICENSE NOS. DPR-38, DPR-47,
AND DPR-55

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

Subject: Response to Request for Additional Information Regarding the License
Amendment Request to Revise Restrictive Technical Specification Surveillance
Requirement Frequencies

Ladies and Gentlemen:

By letter dated February 1, 2023 (ADAMS Accession No. ML23032A162), Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, collectively referred to henceforth as "Duke Energy," submitted a license amendment request (LAR) to modify the Technical Specifications (TS) for Catawba Nuclear Station, Units 1 and 2 (CNS), McGuire Nuclear Station, Units 1 and 2 (MNS), Oconee Nuclear Station, Units 1, 2, and 3 (ONS), H. B. Robinson Steam Electric Plant, Unit No. 2 (RNP), and Shearon Harris Nuclear Power Plant, Unit 1 (HNP). The proposed amendment would revise the Surveillance Requirement (SR) Frequency for Reactor Coolant System pressure isolation valve operational leakage testing to reflect being in accordance with the Inservice Testing Program, as governed by 10 CFR 50.55a. Specifically, this change would update TS SR 3.4.14.1 for CNS, MNS, ONS, and RNP and TS SR 4.4.6.2.2 for HNP. An additional revision was proposed to CNS and MNS TS SR 3.3.1.8 to remove restrictive surveillance Frequency content that impedes the full application of the Surveillance Frequency Control Program to establish the Frequency for performance of the Channel Operational Test of select Reactor Trip System instrumentation.

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the LAR and determined that additional information is needed to complete their review. Duke Energy received the request for additional information (RAI) from the NRC through electronic mail on June 2, 2023 (ADAMS Accession No. ML23153A189), and June 20, 2023 (ADAMS Accession No. ML23172A013).

The Enclosure to this letter provides Duke Energy's response to the RAI. This additional information does not change the conclusions of the No Significant Hazards Consideration and Environmental Consideration in the original LAR. There are no regulatory commitments contained within this letter.

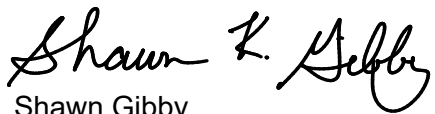
A copy of this RAI response is being provided to the designated North Carolina and South Carolina Officials.

Should you have any questions concerning this letter, or require additional information, please contact Ryan Treadway, Director – Nuclear Fleet Licensing, at 980-373-5873.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2023.

Sincerely,



Shawn Gibby
Vice President – Nuclear Engineering

Enclosure: Response to Request for Additional Information

cc: (all with Enclosure)

- L. Dudes, USNRC Region II – Regional Administrator
- D. Rivard, USNRC Resident Inspector – CNS
- C. Safouri, USNRC Senior Resident Inspector – MNS
- J. Nadel, USNRC Senior Resident Inspector – ONS
- J. Zeiler, USNRC Senior Resident Inspector – RNP
- P. Boguszewski, USNRC Senior Resident Inspector – HNP
- S. Williams, USNRC NRR Project Manager – Fleet

- L. Brayboy, Radioactive Materials Branch Manager, N.C. DHSR
- A. Wilson, Attorney General (SC)
- R. S. Mack, Assistant Bureau Chief, Bureau of Environmental Health Services (SC)
- L. Garner, Manager, Radioactive and Infectious Waste Management Section (SC)

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ENCLOSURE

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

NRC RAI

INTRODUCTION

By letter dated February 1, 2023 (ADAMS Accession No. ML23032A162), Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC collectively referred to henceforth as "Duke Energy," submitted a license amendment request (LAR) to modify the Technical Specifications (TS) for Catawba Nuclear Station, Units 1 and 2 (CNS), McGuire Nuclear Station, Units 1 and 2 (MNS), Oconee Nuclear Station, Units 1, 2, and 3 (ONS), H. B. Robinson Steam Electric Plant, Unit No. 2 (RNP), and Shearon Harris Nuclear Power Plant, Unit 1 (HNP). The proposed amendment would revise the Surveillance Requirement (SR) Frequency for Reactor Coolant System pressure isolation valve operational leakage testing to reflect being in accordance with the Inservice Testing Program, as governed by 10 CFR 50.55a. Specifically, this change would update TS SR 3.4.14.1 for CNS, MNS, ONS, and RNP and TS SR 4.4.6.2.2 for HNP. An additional revision was proposed to CNS and MNS TS SR 3.3.1.8 to remove restrictive surveillance Frequency content that impedes the full application of the Surveillance Frequency Control Program to establish the Frequency for performance of the Channel Operational Test of select Reactor Trip System instrumentation.

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the LAR and determined that additional information is needed to complete their review. Duke Energy received the request for additional information (RAI) from the NRC through electronic mail on June 2, 2023 (ADAMS Accession No. ML23153A189), and June 20, 2023 (ADAMS Accession No. ML23172A013).

RAI No. 1

In the submitted LAR for CNS Units 1 and 2, ONS Units 1, 2 and 3, RNP, HNP and MNS 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 Testing (IST) Program." Please clarify whether all these PIVs are currently in the plants' IST Program 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.

Duke Energy Response to RAI No. 1

All of the PIVs currently required to be tested in accordance with each site's respective TS SR are included within their respective IST Program. The focus of this LAR is to align the performance of the TS surveillance related to RCS PIV operational leakage with the frequency of the leakage testing required in accordance with the IST Program for each site, as based on the applicable edition and addenda of the ASME OM Code incorporated by reference in 10 CFR 50.55a. Aside from the proposed change in testing frequency for the RCS PIVs, the current test method requirements of the TS surveillance remain unchanged, as no new leakage requirements are being added and none are being removed. The valves will continue to be required to meet the leakage limits provided within their respective TS SR.

Per ASME OM Code Subsection ISTC-3630 paragraph (a), leakage rate testing for PIVs is required to be performed at least once every two years. The IST Programs for CNS, HNP and RNP reflect a frequency of testing the RCS PIVs within a two-year period. The IST Program for

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ONS reflects a frequency of testing the Core Flood RCS PIVs at a frequency of “every cold shutdown” and the Low Pressure Injection RCS PIVs at a frequency of “once every two years.”

The IST Program for MNS reflects a frequency of “Per Tech Spec” for testing the RCS PIVs. Upon issuance of the license amendment, the IST Program document will be revised to reflect the ISTC-3630 paragraph (a) frequency of testing the RCS PIVs at least once every two years, as based on the ASME OM Code – 2004 Edition through 2006 Addenda reflected in the MNS IST Program for the fourth 10-year interval (ADAMS Accession No. ML13078A009).

NRC Staff Observation

In the LAR, Attachment 2, “Proposed Technical Specification Bases Changes (mark-up),” CNS, ONS and MNS 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.

Duke Energy Response to Observation

Upon issuance of the license amendments, each respective site’s TS Bases will be updated in accordance with their respective TS Bases Control Program (TS 5.5.14 for CNS and MNS, and TS 5.5.15 for ONS) to reflect the following content based upon the observation above:

The Surveillance Frequency is in accordance with the INSERVICE TESTING PROGRAM, which is based on the applicable edition and addenda of the ASME OM Code as incorporated by reference in 10 CFR 50.55a.