



Steven M. Snider
Vice President
Oconee Nuclear Station

Duke Energy
ON01VP | 7800 Rochester Hwy
Seneca, SC 29672

o: 864.873.3478
f: 864.873.5791

Steve.Snider@duke-energy.com

RA-23-0211

10 CFR 2.201

August 17th, 2023

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: **Duke Energy Carolinas, LLC
Oconee Nuclear Station, Unit 2
Docket No. 50-270
Reply to a Notice of Violation (NOV) - NOV 05000270/2023010-02**

References: 1. NRC Letter to Duke Energy Carolinas, LLC, Oconee Nuclear Station – Biennial Problem Identification and Resolution Inspection Report 05000269/2023010 and 05000270/2023010 and 05000287/2023010 and Notice of Violation, dated July 19, 2023 (ADAMS Accession No. ML23193B048)

The enclosure to this letter provides Duke Energy's reply to the Notice of Violation contained in the enclosure to Reference 1 letter (05000270/2023010-02), dated July 19, 2023. The Notice of Violation was associated with the licensee's failure to promptly correct a condition adverse to quality by providing a means to maintain piping adequately filled with water following refueling outage maintenance.

There are no regulatory commitments contained in this submittal. If there are any questions, contact David Wilson, Manager Nuclear Support Services, at 864-873-3451.

Sincerely,

Steven M. Snider.
Vice President
Oconee Nuclear Station

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cc (with enclosure):

L. Dudes
Regional Administrator
U.S. Nuclear Regulatory Commission - Region II
Marquis One Tower
245 Peachtree Center Ave., NE Suite 1200
Atlanta, GA 30303

J. Nadel
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
Oconee Nuclear Station

S. Williams
NRC Project Manager (ONS)
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Mailstop O-8B1A
Rockville, MD 20852

1.0 Restatement of the Violation

Title 10 CFR Part 50, Appendix B, Criterion XVI, *Corrective Actions*, requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment and non-conformances are promptly identified and corrected.

Contrary to the above, from March 25, 2021, to May 22, 2023, the station failed to correct a condition adverse to quality. Specifically, the licensee failed to correct the deficiency identified in NCV 05000269, 05000270/2021001-01, that station modification ON-23106 added relief valves at local high points, without providing a means to maintain the piping adequately filled with water, following refueling outage maintenance, to avoid water hammer during system operation.

This violation is associated with a Green Significance Determination Process (SDP) finding.

2.0 Reason for the Violation

Condition Report (CR) 02297905-09 was created to revise station procedure OP/2/A/1104/004 B to provide a means to maintain piping associated with station modification ON-23106 adequately filled with water following refueling outage maintenance. The failure to complete CR 02297905-09 to correct a condition adverse to quality within a reasonable time was documented in CR 02472973.

The cause was determined to be a failure to validate the interim measure credited in the justification for the CR 02297905-09 due date extension was properly scoped into the Unit 2 fall 2021 refueling outage.

3.0 Corrective Steps That Have Been Taken and the Results Achieved

The following corrective action was taken to maintain the piping associated with modification ON-23106 adequately filled with water:

Operations procedure OP/2/A/1104/004 B, LPI System Fill and Startup, revision 37 was issued to perform a vacuum fill of 2A and 2B LPI suction relief valve (RV) piping (CR 02297905-09 completed on May 30, 2023).

4.0 Corrective Steps that Will Be Taken

No additional actions to be taken.

5.0 The Date When Full Compliance Will Be Achieved

Full compliance with Appendix B to 10 CFR Part 50, Criterion XVI, *Corrective Action*, with respect to the example cited in this violation, has been achieved by Oconee Nuclear Station on May 30, 2023.