From: Natreon Jordan
To: Treadway, Ryan I
Cc: jordan.vaughan@duke-energy.com
Subject: Acceptance Review - Duke Fleet - Alternative Request for ASME Code Case N-572
Date: Tuesday, December 10, 2024 3:40:00 PM

Ryan Treadway,

By letter dated November 15, 2024 (ML24320A015), Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (Duke, the licensee) submitted a proposed alternative request for Catawba Nuclear Station, Units 1 and 2 (Catawba), McGuire Nuclear Station, Units 1 and 2 (McGuire), Brunswick Steam Generating Plant, Units 1 and 2 (Brunswick), Shearon Harris Nuclear Power Plant, Unit 1 (Harris), and H.B. Robinson Steam Electric Plant, Unit 2 (Robinson). Duke submitted a proposed alternative request to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components." Duke submitted the proposed alternative request to use 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 Class 2 and 3 items in lieu of certain ASME Boiler and Pressure Vessel Code, Section XI, paragraph IWA-1000, IWA-4000, and IWA-6000 requirements.

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

Pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative 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 despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 390 hours to complete. The NRC staff expects to complete this review by December 10, 2025. 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 could 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 me.

-Nate

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