Shawn Williams

From: Shawn Williams
Sent: Tuesday, December 9, 2025 11:14 AM
To: Treadway, Ryan I
Cc: Michael Markley; Vaughan, Jordan L; John Klos
Subject: Catawba, Units 1 and 2 – Acceptance of Two Requested Licensing Actions Re: Amendments to Adopt TSTF-505/TSTF-591 and 50.69 (EPIDS L-2025-LLA-0155 and L-2025-LLA-0156)

Dear Mr. Treadway,

By two letters dated September 30, 2025, Duke Energy Carolinas, LLC, (the licensee, Duke Energy) submitted two license amendment requests (LAR) for Catawba Nuclear Station (Catawba), Units 1 and 2:

1. LAR to Revise Technical Specifications to Adopt Risk-Informed Completion Times TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b" and TSTF-591, Revision 0, "Revise the Risk Informed Completion Time (RICT) Program (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25273A162).
2. LAR to Adopt 10 CFR 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors" (ML25273A166).

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of these amendment requests. The acceptance review was performed to determine whether the applications contain sufficient technical information for the NRC staff to complete a detailed technical review. The acceptance review is also intended to identify any readily apparent deficiencies related to the characterization of the regulatory requirements or the plant licensing basis.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the technical specifications) must fully describe the changes requested and, as applicable, follow the form prescribed for original applications. Section 50.34 of 10 CFR addresses content of the technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it includes sufficient technical information for the NRC staff to complete a detailed technical review and make an independent assessment of the acceptability of the proposed amendments with respect to the regulatory requirements and the protection of public health and safety and the environment. Because the acceptance review is more limited in scope and depth than the detailed technical review, additional issues that could affect the staff's ability to complete the technical review may still be identified. If additional information is needed, you will be notified by separate correspondence.

For these requests, the staff used the Graded Estimate Method (GEM) for licensing actions, which was discussed with industry during a public workshop on August 5, 2025 (ML25217A212). Consistent with this guidance, when an application relies on approved precedents or NRC-approved methodologies without deviation, the technical review should focus primarily on site-specific considerations. In such

cases, confirmatory analyses may be limited to spot checks, and certain areas may receive a less detailed review than in the past. The emphasis is placed on evaluating new or different information that has not been previously addressed.

Appendix B, Table B.1 of the GEM Process indicates that a 10 CFR 50.69 full implementation has historically required 653.5 hours and 12.1 months to complete and is characterized as a "Typical Review." Table 1 of the GEM Process states that a minimum 45 percent reduction from the median historical hours should be attempted for a Typical Review, resulting in an estimated 360 hours.

Appendix B, Table B.2 of the GEM Process indicates that TSTF-505 reviews have historically required 1,356 hours and 12.7 months to complete and may be characterized as either a Typical or Comprehensive Review. Table 1 states that a minimum 30 percent reduction from the median historical hours should be attempted for a Comprehensive Review, resulting in an estimated 950 hours.

Appendix B, Table B.2 of the GEM Process also indicates that a TSTF-591 review adds an additional 41.8 hours and is characterized as a Limited Review. Table 1 states that a minimum 20 percent reduction from the median historical hours should be attempted for a Limited Review, resulting in an estimated 34 hours.

Based on the GEM Process, the NRC staff will aim for the following estimated hours:

- TSTF-505 and TSTF-591 applications: 984 estimated hours, which reflects about a 30% reduction from the median historical hours.
- 10 CFR 50.69 application: 360 estimated hours, which reflects a 45% reduction from the median historical hours.

Due to the government shutdown from October 1 to November 12, 2025, the acceptance review began on November 13, 2025. The acceptance review has now been completed as of the date of this e-mail, December 9, 2025. Based on the GEM process, the staff will aim to complete the request within six months of the acceptance date, which is June 9, 2026.

If the NRC meets the June 9, 2026, completion goal, this would represent a timeliness reduction of:

- TSTF-505 and TSTF-591 applications: approximately 53%.
- 10 CFR 50.69 application: approximately 50%.

If emergent complexities or challenges arise during the NRC staff's review that affect the initial forecasted completion date or result in significant changes to the estimated review hours, the reasons for those changes—along with updated estimates—will be communicated during routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and may change due to several factors, including requests for additional information, unanticipated expansion of the review scope, hearing-related activities, or if the submittal is provided to the NRC in advance of or concurrently with industry program initiatives or pilot applications.

If you have any questions, please contact me.

Shawn Williams, Senior Project Manager
Plant Licensing Branch 2-1

Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.
50-413, 50-414

cc: Listserv