Shawn Williams

From: Shawn Williams
Sent: Monday, December 8, 2025 3:04 PM
To: Treadway, Ryan I; Vaughan, Jordan L
Cc: Michael Markley; John Klos
Subject: Oconee Nuclear Station, Units 1, 2 and 3 – Acceptance of Requested Licensing Action Re: Amendment Request Proposing to Revise Technical Specification 3.4.3, "RCS Pressure and Temperature (P/T) Limits" (EPID L-2025-LLA-0164)

Dear Mr. Treadway,

By letter dated October 30, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25303A005), Duke Energy Carolinas, LLC, (the licensee, Duke Energy) submitted a license amendment for Oconee Nuclear Station, Units 1, 2, and 3 (ONS). Duke Energy proposes to revise TS 3.4.3, "RCS Pressure and Temperature (P/T) Limits," to reflect updated P/T limit curves and that the revised P/T limit curves are applicable to 72 EFPY (i.e., 80 years of operation).

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 amendment request. The acceptance review was performed to determine whether the application 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 amendment 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 this request, the staff used the Graded Estimate Method (GEM) for licensing actions, as discussed with industry during a public workshop on August 5, 2025 (ML25217A212). Consistent with GEM guidance, when an application relies on approved precedents or NRC-approved methodologies without deviation, the technical review focuses 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, with emphasis placed on evaluating new or different information that has not been previously addressed.

In accordance with GEM guidance, the staff has classified this request as a Comprehensive Review. The technical approach used in this submittal is relatively uncommon compared to current industry practice. While most recent P–T limit amendments have adopted a PTLR (Pressure-Temperature Limits Report) or other streamlined methodologies, this request involves a direct and detailed update to the Technical Specification figure. As a result, available precedents are not directly analogous, and prior NRC reviews are not fully transferable.

Given these considerations, the staff reviewed similar historical requests to determine median review hours. Applying the GEM expectation of a 30% reduction from that median for Comprehensive Reviews, the staff estimates approximately 425 hours and will aim to complete the review within that range, recognizing that actual effort may vary.

Under the GEM process, Comprehensive Reviews are to be completed within 9 months of application acceptance. Due to the government shutdown from October 1 to November 12, 2025, the acceptance review began on November 13, 2025, and has now been completed as of December 8, 2025. Based on this acceptance date, the staff will aim to complete the review by September 8, 2026.

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.
50-269, 50-270, 50-287

cc: Listserv