UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 17, 2026

Mr. Shawn Gibby
Vice President
Nuclear Engineering
Duke Energy
525 S. Tryon St.
Charlotte, NC 28202

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2, CATAWBA NUCLEAR STATION, UNITS 1 AND 2; SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1; MCGUIRE NUCLEAR STATION, UNITS 1 AND 2; OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3; AND H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 - AUTHORIZATION OF PROPOSED ALTERNATIVE TO USE ASME OM CODE CASE OMN-35 FOR INSERVICE TESTING (EPID L-2026-LLR-0052)

Dear Mr. Gibby:

By letter dated July 16, 2026 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML26197A254), Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (the licensee, Duke Energy) submitted Request RA-26-0129 to the U.S. Nuclear Regulatory Commission (NRC) proposing an alternative to specific inservice testing (IST) requirements in the applicable editions of the American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code), as incorporated by reference in Title 10 of the *Code of Federal Regulations*, Section 50.55a, “Codes and standards” (10 CFR 50.55a), associated with the IST Program at the following Duke Energy units: Brunswick Steam Electric Plant, Units 1 and 2 (Brunswick); Catawba Nuclear Station, Units 1 and 2 (Catawba); Shearon Harris Nuclear Power Plant, Unit 1 (Harris); McGuire Nuclear Station, Units 1 and 2 (McGuire); Oconee Nuclear Station, Units 1, 2, and 3 (Oconee); and H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson).

Specifically, pursuant to 10 CFR 50.55a(z)(1), the licensee requested to implement the proposed alternative on the basis that it provides an acceptable level of quality and safety. The request seeks authorization to adopt ASME OM Code Case OMN-35, “Alternative to ISTC-3700,” for position verification testing of valves with remote position indication across the applicable Duke Energy nuclear power plants.

The NRC staff has reviewed the proposed alternative, and as set forth in the enclosed safety evaluation, has determined that the proposed alternative to implement ASME OM Code Case OMN-35 for the applicable Duke Energy nuclear power plants within the scope of this request provides an acceptable level of quality and safety for IST activities for the affected components. Accordingly, the NRC staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(z)(1) for this proposed alternative. Therefore, pursuant to 10 CFR 50.55a(z)(1), the NRC staff authorizes the proposed alternative in lieu of the applicable IST requirements in the 2017, 2020, and 2022 Editions of the ASME OM

Code, as incorporated by reference in 10 CFR 50.55a, for the specified valves within the scope of the request for the respective Code of Record (COR) intervals at the applicable Duke Energy nuclear power plants. Use of this alternative with other CORs is not authorized.

All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested, and granted or authorized (as appropriate), remain applicable.

If you have any questions, please contact the project manager, Dennis Galvin at 301-415-6256 or Dennis.Galvin@nrc.gov.

Sincerely,

STACY JOSEPH

Digitally signed by STACY JOSEPH
Date: 2026.11.17 15:02:05 -05'00'

Stacy Joseph, Acting Chief
Operating Reactor Licensing Branch 2
Division Licensing Projects I
Office of Nuclear Reactor Regulation

Docket Nos. 50-325, 50-324, 50-413, 50-414,
50-400, 50-369, 50-370, 50-269, 50-270,
50-287, and 50-261

Enclosure:
Safety Evaluation

cc: Listserv

SAFETY EVALUATION BY THE NRC OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED ALTERNATIVE REQUEST RA-26-0129

USE OF ASME OM CODE CASE OMN-35 FOR INSERVICE TESTING

DUKE ENERGY CAROLINAS, LLC, AND DUKE ENERGY PROGRESS, LLC

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2; CATAWBA NUCLEAR STATION, UNITS 1 AND 2; SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1; MCGUIRE NUCLEAR STATION, UNITS 1 AND 2; OCONEE NUCLEAR STATION, UNIT NOS. 1, 2, AND 3; AND H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NOS. 50-325, 50-324, 50-413, 50-414, 50-400, 50-369, 50-370, 50-269, 50-270, 50-287, AND 50-261

1.0 INTRODUCTION

By letter dated July 16, 2026 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML26197A254), Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (the licensee, Duke Energy) submitted Request RA-26-0129 to the U.S. Nuclear Regulatory Commission (NRC) proposing an alternative to specific inservice testing (IST) requirements in the applicable editions of the American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code), as incorporated by reference in Title 10 of the *Code of Federal Regulations*, Section 50.55a, "Codes and standards" (10 CFR 50.55a), associated with the IST Program at the following Duke Energy units: Brunswick Steam Electric Plant, Units 1 and 2 (Brunswick); Catawba Nuclear Station, Units 1 and 2 (Catawba); Shearon Harris Nuclear Power Plant, Unit 1 (Harris); McGuire Nuclear Station, Units 1 and 2 (McGuire); Oconee Nuclear Station, Units 1, 2, and 3 (Oconee); and H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson).

Specifically, pursuant to 10 CFR 50.55a(z)(1), the licensee requested to implement the proposed alternative on the basis that it provides an acceptable level of quality and safety. The request seeks authorization to adopt ASME OM Code Case OMN-35, "Alternative to ISTC-3700," for position verification testing of valves with remote position indication across the applicable Duke Energy nuclear power plants.

2.0 REGULATORY EVALUATION

The NRC regulations in 10 CFR 50.55a(f)(4), "Inservice testing standards requirement for operating plants," state that throughout the service life of a boiling or pressurized water-cooled nuclear power facility, pumps and valves that are within the scope of the ASME OM Code must meet the IST requirements (except design and access provisions) set forth in the ASME OM Code and addenda specified in 10 CFR 50.55a(f)(2) and (3) and that are incorporated by

reference in 10 CFR 50.55a(a), to the extent practical within the limitations of design, geometry, and materials of construction of the components.

In addition, for valve position verification testing, the NRC regulations in 10 CFR 50.55a(b)(3)(xi), "OM Condition: Valve Position Indication," require that when implementing ASME OM Code, Subsection ISTC, "Inservice Testing of Valves in Water-Cooled Reactor Nuclear Power Plants," paragraph ISTC-3700, "Position Verification Testing," licensees must verify that valve operation is accurately indicated by supplementing valve position indicating lights with other indications, such as flow meters or other suitable instrumentation, to provide assurance of proper obturator position for valves with remote position indication.

The NRC regulations in 10 CFR 50.55a(z), "Alternatives to codes and standards requirements," state:

> Alternatives to the requirements of [10 CFR 50.55a(b) through (h)] or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation. A proposed alternative must be submitted and authorized prior to implementation. The applicant or licensee must demonstrate that:
>
> (1) "Acceptable level of quality and safety." The proposed alternative would provide an acceptable level of quality and safety; or
>
> (2) "Hardship without a compensating increase in quality and safety." Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

3.0 TECHNICAL EVALUATION

3.1 Licensee's Alternative Request RA-26-0129

Applicable ASME OM Code Edition

The licensee's submittal identifies the applicable ASME OM Code editions, IST intervals, Code of Record (COR) start dates, and IST Program transmittals for each station. The information for each station is as follows:

> The applicable COR for the Sixth and Seventh IST Program Intervals at Brunswick is the 2022 Edition of the ASME OM Code as incorporated by reference in 10 CFR 50.55a. The Sixth IST Program Interval at Brunswick will begin on December 22, 2027.
>
> The applicable COR for the Fifth and Sixth IST Program Intervals at Catawba is the 2020 Edition of the ASME OM Code as incorporated by reference in 10 CFR 50.55a. The Fifth IST Program Interval at Catawba began on August 19, 2026.
>
> The applicable COR for the Fifth and Sixth IST Program Intervals at Harris is the 2022 Edition of the ASME OM Code as incorporated by reference in 10 CFR 50.55a. The Fifth IST Program Interval at Harris will begin on May 1, 2027.
>
> The applicable COR for the Fifth and Sixth IST Program Intervals at McGuire is the 2020 Edition of the ASME OM Code as incorporated by reference in 10 CFR 50.55a. The Fifth

IST Program Interval at McGuire began on March 1, 2025, utilizing ASME OM Code Case OMN-31.

The applicable COR for the Sixth and Seventh IST Program Intervals at Oconee is the 2017 Edition of the ASME OM Code as incorporated by reference in 10 CFR 50.55a. The Sixth IST Program Interval at Oconee began on July 1, 2023.

The applicable COR for the Sixth and Seventh IST Program Intervals at Robinson is the 2017 Edition of the ASME OM Code as incorporated by reference in 10 CFR 50.55a. The Sixth IST Program Interval at Robinson began on February 19, 2023.

ASME OM Code Components

For each station listed above, all valves in the IST Program at the applicable Duke Energy nuclear power plant that are within the scope of ASME OM Code, Subsection ISTC, paragraph ISTC-3700, are covered by this proposed alternative.

Applicable OM Code Requirements

ASME OM Code, Subsection ISTC, paragraph ISTC-3700, requires that valves with remote position indicators be observed locally at least once every 2 years to verify that valve operation is accurately indicated. Where practicable, local observation should be supplemented by other indications such as flow meters or other suitable instrumentation to verify obturator position. Observations need not be concurrent. Position verification for active motor-operated valves (MOVs) shall be tested in accordance with Division 1, Mandatory Appendix III, “Preservice and Inservice Testing of Active Electric Motor-Operated Valve Assemblies in Water-Cooled Reactor Nuclear Power Plants.”

Licensee’s Proposed Alternative, Basis, and Reason for Request

In accordance with 10 CFR 50.55a(z)(1), the licensee requests authorization to use ASME OM Code Case OMN-35 as an alternative to the requirements in ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as incorporated by reference in 10 CFR 50.55a for valves with remote position indication at Brunswick, Catawba, Harris, McGuire, Oconee, and Robinson.

Under ASME OM Code Case OMN-35, each affected valve is exercised to the open and closed positions to confirm remote indication changes with valve operation, and obturator position is verified using other indications such as flow meters or other suitable instrumentation consistent with ISTC-3700 and 10 CFR 50.55a(b)(3)(xi). The proposed frequency is once every 4 years for active valves and once every 8 years for passive valves, with more frequent testing if indicated by historical data.

3.2 NRC Staff Evaluation

In Alternative Request RA-26-0129, the licensee proposes to implement ASME OM Code Case OMN-35 for position verification testing as an alternative to the requirements of ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as supplemented by 10 CFR 50.55a(b)(3)(xi). The proposed alternative applies to valves within the scope of ISTC-3700 in the applicable IST Programs at Brunswick, Catawba, Harris, McGuire, Oconee, and Robinson. The licensee proposes that this alternative be implemented during each unit’s COR intervals for the applicable editions of the ASME OM Code, as specified in Table 2.1 of the licensee’s submittal.

For all valves within the scope of ISTC-3700 in the IST Programs at the applicable Duke Energy nuclear power plants, the proposed implementation of ASME OM Code Case OMN-35 specifies that valves with remote position indicators shall be exercised to verify that valve operation is accurately indicated for both the open and closed positions. The observation shall be supplemented by other indications, such as the use of flow meters or other suitable instrumentation, or by the verification methods and frequencies specified in the mandatory appendices, to verify obturator position. These observations need not be concurrent. The proposed alternative allows the position verification test interval to be extended from at least once every 2 years to once every 4 years for active valves and once every 8 years for passive valves, unless historical data requires more frequent testing. Position verification for active MOVs shall be performed in accordance with Division 1, Mandatory Appendix III.

The NRC supplemented ASME OM Code, Subsection ISTC, paragraph ISTC-3700, in 10 CFR 50.55a(b)(3)(xi) to address the use of the term “should” in the ASME OM Code. Code Case OMN-35 is limited to valves for which supplemental verification provides definitive indications of both the open and closed obturator positions. Valves that do not satisfy the scope and provisions of Code Case OMN-35 remain subject to ISTC-3700 as supplemented by 10 CFR 50.55a(b)(3)(xi). The NRC staff finds that the licensee’s proposed implementation of Code Case OMN-35 satisfies the requirement in 10 CFR 50.55a(b)(3)(xi) that licensees verify that valve operation is accurately indicated by supplementing valve position indicating lights with other indications, such as flow meters or other suitable instrumentation, to provide assurance of proper obturator position for valves with remote position indication within the scope of Subsection ISTC. The staff notes that 10 CFR 50.55a(b)(3)(xi) references the valve position indication requirements in the mandatory appendices of the ASME OM Code and their verification methods and frequencies.

In lieu of the current 2-year position verification interval specified in paragraph ISTC-3700, the licensee’s proposed implementation of Code Case OMN-35 would allow the position verification test interval to be extended to once every 4 years for active valves and once every 8 years for passive valves, unless historical data require more frequent testing. With the proposed alternative applying to valves in the IST Programs within the scope of ISTC-3700, the NRC staff finds that these extensions are acceptable considering the required supplemental actions to verify valve position indication. When historical data require more frequent testing, the proposed alternative requires corrective actions to be performed in accordance with the applicable station’s Quality Assurance (QA) Program, as specified in ASME OM Code, Subsection ISTA, “General Requirements,” paragraph ISTA-3300, “Corrective Actions,” and as further specified in ASME OM Code Case OMN-35. These QA Programs are required by 10 CFR Part 50, Appendix B, “Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants.” The NRC staff expects these corrective actions will include assessment of the cause of an adverse position indication for a valve, and the applicability of the cause of the adverse indications to other valves within the scope of the IST Program.

The NRC staff notes that the applicable CORs for the IST intervals covered by the proposed alternative are the 2017 Edition of the ASME OM Code for Oconee and Robinson; the 2020 Edition for McGuire and Catawba; and the 2022 Edition for Harris and Brunswick. The licensee may implement Code Case OMN-35 beginning on the date of issuance of this safety evaluation and continue its use for the remainder of the applicable COR interval for these Duke Energy nuclear power plants.

The NRC regulations in 10 CFR 50.55a(f)(7) require that Inservice Testing Program Test and Examination Plans (IST Plans) for pumps, valves, and dynamic restraints (snubbers) prepared

to meet the requirements of the ASME OM Code be submitted to the NRC as specified in 10 CFR 50.4, “Written communications.” This alternative request applies to the valves with remote position indicators identified in the IST Plan submitted as required by 10 CFR 50.55a(f)(7).

The NRC staff notes that the generic acceptance of ASME OM Code Cases is specified in NRC Regulatory Guide (RG) 1.192, “Operation and Maintenance Code Case Acceptability, ASME OM Code,” (current Revision 5), as incorporated by reference in 10 CFR 50.55a with any applicable regulatory positions. The NRC staff participating in the ASME OM Code committees approved the issuance of ASME OM Code Case OMN-35 during the committee ballot process. However, the NRC staff has not prepared a revision to RG 1.192 (either draft or final) that addresses the generic acceptability of ASME OM Code Case OMN-35. Therefore, this SE is only applicable to the specific nuclear power plants within the scope of this request and their current CORs. Any regulatory positions determined to be appropriate for the use of ASME OM Code Case OMN-35 during NRC preparation of a future revision to RG 1.192 will be addressed by the NRC staff at that time.

Based on the above, the NRC staff has determined that the proposed alternative to implement ASME OM Code Case OMN-35 may be authorized pursuant to 10 CFR 50.55a(z)(1) on a plant-specific basis for the nuclear power plants within the scope of this request and their current CORs because it provides an acceptable level of quality and safety for verifying valve position indication in lieu of the applicable valve IST requirements in ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as supplemented by 10 CFR 50.55a(b)(3)(xi).

4.0 CONCLUSION

As set forth above, the NRC staff determined that the proposed alternative to implement ASME OM Code Case OMN-35 for the applicable Duke Energy nuclear power plants within the scope of this request provides an acceptable level of quality and safety for IST activities for the affected components. Accordingly, the NRC staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(z)(1) for this proposed alternative. Therefore, pursuant to 10 CFR 50.55a(z)(1), the NRC staff authorizes the proposed alternative in lieu of the applicable IST requirements in the 2017, 2020, and 2022 Editions of the ASME OM Code, as incorporated by reference in 10 CFR 50.55a, for the specified valves within the scope of the request for the respective COR intervals at the applicable Duke Energy nuclear power plants. Use of this alternative with other CORs is not authorized.

All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested, and granted or authorized (as appropriate), remain applicable.

Date: November 17, 2026

SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2, CATAWBA NUCLEAR STATION, UNITS 1 AND 2; SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1; MCGUIRE NUCLEAR STATION, UNITS 1 AND 2; OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3; AND H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 - AUTHORIZATION OF PROPOSED ALTERNATIVE TO USE ASME OM CODE CASE OMN-35 FOR INSERVICE TESTING (EPID L-2026-LLR-0052) NOVEMBER 17, 2026

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