

Oconee Nuclear Station  
RPS/ESPS Digital Upgrade  
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# Terminology

RPS/ESPS    Reactor Protective System  
and Engineered Safeguards  
Protective System

# Oconee RPS/ESPS Submittal

- Replacing legacy analog system with digital technology
- Addresses obsolescence issues
- Improves nuclear safety, reliability, and safety system availability
- Anticipate regulatory approval in Fall of 2009
- First implementation in Spring of 2011

# Licensing Process Experience

- Oconee submittal review in parallel with development of the proposed process
- Interim Staff Guidance beneficial to Oconee submittal
- Recognize the significant efforts of the NRC to support this submittal review
- Industry interest in the licensing process

# Going Forward

- Appreciate NRC working with industry to develop digital licensing guidance
- Agree with the proposed multi-tier review structure that can streamline reviews
- Two process concerns remain:
  - Burden of amount of docketed material
  - Approval after factory acceptance test

# Continuing Efforts

- Oconee licensing submittal is an important first step
- Mutual interest in enabling digital upgrades
- We believe it is possible to:
  - Satisfy all safety and regulatory requirements
  - Further reduce licensee risk and burden
- Would welcome opportunity to continue to refine this process