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ONS-2014-053

April 10, 2014

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Duke Energy Carolinas, LLC (Duke Energy)
Oconee Nuclear Station Units 3
Docket Numbers 50-287
Response to Request for Additional Information (RAI) regarding the Fourth Ten Year
Interval ISI Plan, Relief Request 13-ON-001 (ADAMS Accession No. ML14040A014)

On September 26, 2013, Duke Energy submitted Relief Request 13-ON-001 (ADAMS Accession No. ML13273A037) pursuant to 10 CFR 50.55a(g)(5)(iii), requesting that NRC grant relief from the requirement to examine 100% of the volume specified by the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). On February 7, 2014, the NRC submitted a Request for Additional Information electronically (via E-mail) regarding this Relief Request. The Duke Energy response to the RAI questions is attached as an enclosure.

There are no regulatory commitments associated with this letter.

If you have any questions concerning this letter, or require additional information, please contact Corey Gray at (864) 873-6325.

Sincerely,

Scott L. Batson
Vice President
Oconee Nuclear Station

Enclosure:

Oconee Nuclear Station Unit 3, Duke Energy's Response to Request for Additional Information (RAI), Relief Request 13-ON-001, 3EOC-26 Limited Weld Examinations

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NRR

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xc :

Mr. Victor McCree, Regional Administrator
U.S. Nuclear Regulatory Commission – Region II
Marquis One Tower
245 Peachtree Center Ave., NE Suite 1200
Atlanta, Georgia 30303-1257

Mr. James R. Hall, Project Manager (ONS)
(by electronic mail only)
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Mail Stop O-8B1
Rockville, MD 20852

Mr. Eddy Crowe
NRC Senior Resident Inspector
Oconee Nuclear Station

Susan Jenkins
Section Manager
Division of Waste Management
SC Dept. of Health & Environment Control
2600 Bull St.
Columbia, SC 29201

Enclosure

**Oconee Nuclear Station Unit 3
Duke Energy's Response to Request for Additional Information (RAI)
Relief Request 13-ON-001
3EOC-26 Limited Weld Examinations**

DUKE ENERGY'S REPONSE to REQUEST for ADDITIONAL INFORMATION

RAI-1

Request for Relief 13-ON-001, Sections 6 & 7, ASME Code, Section XI, Examination Category B-J, Unit 3 Piping Welds, Low Pressure Injection System, Pipe to Valve (3CF-11 & 3CF-14), Welds 3-53A-15-26 & 3CF-126-4, Summary Numbers 03.B9.11.0106 & 03.B9.11.0129, ASME Code Class 1.

- a. State the active degradation mechanisms for welds 3-53A-15-26 and 3CF-126-4, if any.

Duke reply: These welds were examined to satisfy the requirements of ASME Section XI, IWB-2500, Examination Category B-J, which does not require a degradation mechanism determination. See RAI-1(c) below for additional information.

- b. Are the welds part of a risk informed inservice inspection program?

Duke reply: No

- c. Is there any operational experience showing inservice cracking of similar welds exposed to similar environmental conditions?

Duke reply: A search was performed for cracking on these welds and similar welds, in our ISI database and the Duke Corrective Action Program and none was found.

RAI-2

Request for Relief 13-ON-001, Section 8 ASME Code, Section XI, Examination Category C-A, Item C1.30 Pressure Retaining Welds in Vessels for ON, Unit 3 Steam Generator A, Feedwater System, Tubesheet-to-Shell Weld # 3-SGA-W69 Summary Number 03.C1.30.0002, ASME Code Class 2.

The NRC staff notes that in RR 13-ON-001, Section 8, conflicting examination methodologies are stated in the following subsections:

- In Paragraph 8.4, "Impracticability of Compliance," it is stated that, "scanning requirements are described in ASME Code, Section V, Article 4 T-441.1.2(a), T-441.1.3, T-441.1.4, T-441.1.5, and T-441.1.6."
- In Paragraph 8.5, "Proposed Alternative and Basis for Use," it is stated that "this weld was examined using procedures, equipment and personnel qualified in accordance with ASME Code, Section XI, Appendix VIII."
- It is also stated in Attachment "A", UT Calibration Examination Sheet (Page 81 of 96), that Procedure NDE-640 was used.

Please clarify what examination methodologies were used in examining Tubesheet-to-Shell Weld # 3-SGA-W69.

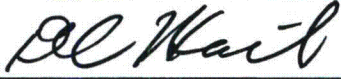
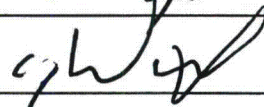
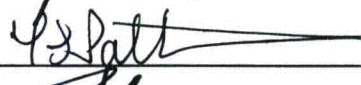
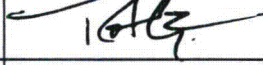
Duke Reply: This weld was inspected in accordance with ASME Section V, Article 4 requirements, as modified by ASME Section XI, Article 1, Table I-2000-1. Code required examinations were performed using Procedure NDE-820 and appropriately qualified personnel. A supplemental "zero degree" exam was performed using Procedure NDE-640 and appropriately qualified personnel, in addition to the Code required examinations. No flaws were detected in either exam.

**Outgoing Regulatory Correspondence
Review & Approval Documentation**

ATTACHMENT 2
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PART IV – REVIEW AND APPROVAL

Each Reviewer and Approver by their signature attests that, to the best of his or her knowledge, the input provided is accurate, complete, and free from Material False Statement.

Reviewer / Approver	Title / Organization	Signature, email, or telecom	Date
Gary Scarboro	Sr Tech Spc / ASME Sect XI Services	See ASME Services Review Form (attached)	4-3-14
Ned Finney Jr	Lead Nuc NDE Spc / ASME Sect XI Services	See ASME Services Review Form (attached)	3-31-14
Sandy Clark	Lead Engr / ASME Sect XI Services	See ASME Services Review Form (attached)	4-3-14
Lester Stauffer	Lead Nuc NDE Spc / Fleet Program Engr	See ASME Services Review Form (attached)	3-31-14
Mark Pyne	Manager / Nuc Engr Support	See ASME Services Review Form (attached)	4-3-14
Reg. Affairs Lead: David Haile	Lead Engr / Reg Affairs		4-3-14
Peer Reviewer (Optional):	N/A	N/A	N/A
Christopher J. Wasik	Manager / Reg. Affairs		4/4/14
Terry Patterson	Director / OE Org. Effectiveness		4/9/14
Bob Guy	Director / Site Support		4-9-2014
Signature Authority	Site Vice President	(Signs the letter)	

Oath or Affirmation required on cover letter or enclosures?

YES ☐NO ☒

Return To: David Haile
Regulatory Affairs Lead

864-873-4742
Extension