




Pre-Submittal Meeting with the NRC – 10 CFR 50.69 Applications
November 29, 2017

DUKE ENERGY®

Introductions

- Art Zaremba, Duke Fleet Licensing Manager
- Allison Young, Licensing Engineer
- Heather Szews, Risk Informed Engineering Manager
- Jennifer Varnedoe, Risk Informed Engineering Project Lead
- Steve Kimbrough, Risk Informed Engineering PRA

Agenda

- Purpose of Meeting
- License Amendment Background
- Operating Experience
- 50.69 Evaluations: Robinson, Brunswick, Harris

Purpose of Meeting

- Dialogue and Feedback
- Recognize NRC/Industry Efforts
- Recent Operating Experience
- Duke LAR Content

License Amendment Background

- Delivering the Nuclear Promise Efficiency Bulletins
  - 17-09 LAR Submittal
    - LAR Template
  - 17-16 Process Implementation
- LAR Coordinating Committee
  - Peer reviews of all LARs before submittal
  - Successfully mitigated a number of issues that would challenge acceptance and approval
  - Improves the LAR template with input from utilities and non-acceptance reviews
- Joint Owners' Group Committee
  - Collaboration
  - Sharing infrastructure
  - Training
  - Information Sharing

- Peer Reviews against RG 1.200, Revision 1 and associated gap assessments to RG 1.200, Revision 2
- Peer Review scope
- Formally accepted methods for Fire PRAs
- Technical justification for additional sensitivity analyses during the categorization process (PRA model uncertainties)
- F&O Closure Pilot
- Clarification of external hazard model usage

- Submittal expected in 4th Quarter 2017
- Safety Committee Review expected to be complete by December 14
- No exceptions to the process as outlined in NEI 00-04 and endorsed in RG 1.201
- Clarifications to the process as outlined in NEI 00-04
- PRA Information:
  - Submittal credits Internal Events, Internal Flood, and Fire PRA
  - PRA Technical adequacy previously reviewed in NFPA 805 Application and ILRT Interval Application
  - RG 1.200 Rev 2 full scope peer reviews for Internal Events, Internal Flood, and Fire PRA
  - NEI 05-04 and NEI 07-12 Appendix X F&O Closure completed for all 3 models
- Seismic Risk Assessment:
  - Submittal credits IPEEE Seismic Margins Analysis for Seismic Hazard analysis
- External Hazards:
  - Submittal screens external hazards except Extreme Wind or Tornado
    - Consistent with NEI 00-04, all SSCs necessary to protect against these hazards as credited in the IPEEE screening analysis are considered HSS.

Brunswick Application

- Submittal expected in 4th Quarter 2017
- Safety Committee Review expected to be complete by December 14
- No exceptions to the process as outlined in NEI 00-04 and endorsed in RG 1.201
- Clarifications to the process as outlined in NEI 00-04
- PRA Information:
  - Submittal credits Internal Events, Internal Flood, Fire, High Winds, and External Flood PRAs
  - PRA technical adequacy previously reviewed in NFPA 805 Application and TSTF-425 Application
  - RG 1.200 Rev 2 full scope peer reviews for Internal Events, Internal Flood, Fire, High Winds, and External Flood PRAs
  - NEI 05-04, NEI 07-12, and NEI 12-13 Appendix X F&O Closure completed for all 3 models
- Seismic Risk Assessment:
  - Submittal credits IPEEE Seismic Margins Analysis for Seismic Hazard analysis
- External Hazards:
  - Submittal screens external hazards except High Winds and External Flood

- Submittal expected in 4th Quarter 2017
- Safety Committee Review expected to be complete by December 14
- No exceptions to the process as outlined in NEI 00-04 and endorsed in RG 1.201
- Clarifications to the process as outlined in NEI 00-04
- PRA Information:
  - Submittal credits Internal Events, Internal Flood, and Fire PRAs
  - PRA technical adequacy previously reviewed in NFPA 805 Application and TSTF-425 Application
  - IE Peer Review by WOG prior to RG 1.200, IF Peer Review to RG 1.200 Rev 2
  - Fire Peer Review to ANSI/ANS-58.23-2007
  - F&O Closure for Internal Events and Internal Flood Pilot
  - NEI 07-12 Appendix X F&O Closure completed for Fire model
- Seismic Risk Assessment:
  - Submittal credits IPEEE Seismic Margins Analysis for Seismic Hazard analysis
- External Hazards
  - Submittal screens all external hazards


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