

## **NRR-DMPSPEm Resource**

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**From:** Klett, Audrey  
**Sent:** Monday, March 12, 2018 4:17 PM  
**To:** Wasik, Christopher J  
**Cc:** Haile, David  
**Subject:** Request for Additional Information - Oconee RR-17-ON-001 (EPID L-2017-LLR-0099)  
**Attachments:** FINAL RAI Oconee L-2017-LLR-0099 RR-17-ON-001.docx

Hi Chris,

By letter ONS-2017-72 dated October 3, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17279A108), as supplemented by letter ONS 2017-079 dated November 13, 2017 (ADAMS Accession No. ML17321A076), Duke Energy Carolinas, LLC (the licensee) submitted Relief Request No. 17 ON-001 to the U.S. Nuclear Regulatory Commission (NRC) for fifth 10-year inservice inspection intervals of the Oconee Nuclear Station, Units 1 and 2. The NRC staff determined that it needs additional information to complete its review. By email dated March 5, 2018, NRC staff provided the licensee a draft of its request for additional information (RAI). Per a discussion with Mr. David Haile of the licensee's staff on March 8, 2018, it was determined that the RAI phrasing did not need revised. Per our discussion on March 12, 2018, the NRC staff understands that the licensee has a goal to respond to the attached RAI on or by March 23, 2018.

Thank you,  
Audrey

**Hearing Identifier:** NRR\_DMPS  
**Email Number:** 241

**Mail Envelope Properties** (Audrey.Klett@nrc.gov20180312161600)

**Subject:** Request for Additional Information - Oconee RR-17-ON-001 (EPID L-2017-LLR-0099)  
**Sent Date:** 3/12/2018 4:16:58 PM  
**Received Date:** 3/12/2018 4:16:00 PM  
**From:** Klett, Audrey  
**Created By:** Audrey.Klett@nrc.gov

**Recipients:**  
"Haile, David" <David.Haile@duke-energy.com>  
Tracking Status: None  
"Wasik, Christopher J" <Christopher.Wasik@duke-energy.com>  
Tracking Status: None

**Post Office:**

Files	Size	Date & Time
MESSAGE	988	3/12/2018 4:16:00 PM
FINAL RAI Oconee L-2017-LLR-0099 RR-17-ON-001.docx		26377

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

REQUEST FOR ADDITIONAL INFORMATION  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
PROPOSED ALTERNATIVE TO REACTOR VESSEL NOZZLE WELD  
EXAMINATION FREQUENCY REQUIREMENTS  
DUKE ENERGY CAROLINAS, LLC  
OCONEE NUCLEAR STATION, UNITS 1 AND 2  
DOCKET NOS. 50-269 AND 50-270

1.0 INTRODUCTION

By letter ONS-2017-72 dated October 3, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17279A108), as supplemented by letter ONS-2017-079 dated November 13, 2017 (ADAMS Accession No. ML17321A076), Duke Energy Carolinas, LLC (the licensee) submitted Relief Request No. 17-ON-001 to the U.S. Nuclear Regulatory Commission (NRC) for fifth 10-year inservice inspection (ISI) intervals of the Oconee Nuclear Station, Units 1 and 2. Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Paragraph 55a(z)(2), the licensee requested the NRC to authorize the use of an alternative to the examination frequency requirements of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code Case N-770, "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR Piping and Vessel Nozzle Butt Welds Fabricated with UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities Section XI, Division 1," as required by 10 CFR 50.55a(g)(6)(ii)(F), for reactor vessel core flood nozzle dissimilar metal butt welds.

2.0 REGULATORY EVALUATION

Pursuant to 10 CFR 50.55a(g)(4), "Inservice inspection [ISI] standards requirement for operating plants," ASME Code Class 1, 2, and 3 components (including supports) must meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components.

Pursuant to 10 CFR 50.55a(g)(6)(ii), "Augmented ISI Program," the NRC may require licensees to follow an augmented [ISI] program for systems and components for which the Commission deems that added assurance of structural reliability is necessary.

Pursuant to 10 CFR 50.55a(g)(6)(ii)(F)(1), "Augmented ISI requirements: Examination requirements for Class 1 piping and nozzle dissimilar-metal butt welds—(1) Implementation," licensees shall implement the requirements of ASME BPV Code Case N-770-2 instead of ASME BPV Code Case N-770-1, subject to the conditions specified in paragraphs (g)(6)(ii)(F)(2) through (13) of Section, by the first refueling outage starting after August 17, 2017.

Pursuant to 10 CFR 50.55a(z)(2), alternatives to the requirements of paragraphs (b) through (h) of Section 50.55a, or portions thereof, may be used when authorized by the NRC if the licensee demonstrates that compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

### 3.0 REQUEST FOR ADDITIONAL INFORMATION

In order to support the staff's review of the licensee's proposed alternative, the following additional information is requested.

Under Section 3 of the Enclosure to its submittal dated October 3, 2017, the licensee provides a note. This note states, "This relief request will apply to future versions of Code Case N-770 that may be incorporated in 10 CFR 50.55a(g)(6)(ii)(F)(1) provided the Item B maximum examination frequency continues to be less than 10 years." While this note is not specifically listed in Section 5 in the licensee's submittal as part of the proposed alternative, the staff believes that a stakeholder could consider it as part of the licensee's proposed alternative. As required by 10 CFR 50.55a(z), the staff can either approve or disapprove of a licensee's proposed alternative but cannot alter it in form.

The staff is limited in its authority to provide relief from or authorize alternatives to future requirements of 10 CFR 50.55a unless the provisions of 10 CFR 50.55a specifically allow such relief. There is no apparent provision in the CFR to allow relief from future versions of the rules. Therefore, the staff has no authority to grant relief from or authorize alternatives to future versions of rules and requirements under the augmented ISI section of the Code. Therefore, given the licensee's Note in Section 3 of the Enclosure to its submittal dated October 3, 2017, can be considered part of the licensee's proposed alternative, and the staff does not have the authority to approve relief from or authorize alternatives to future versions of this section of the CFR, the staff requests that the licensee consider clarification of the note in Section 3.