

From: [Williams, Shawn](#)
To: Lee.Grzeck@duke-energy.com
Cc: [Vaughan, Jordan L](#)
Subject: Oconee Nuclear Station, Units 1, 2, and 3 - Request for Additional Information RE: Alternative Request (ON-RPI-OMN-28) to use Code Case OMN-28 (EPID: L-2021-LLR-0054)
Date: Thursday, September 30, 2021 9:11:31 AM

Dear Mr. Grzeck,

By a letter dated July 29, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21210A341), as supplemented by a letter dated August 19, 2021 (ADAMS Accession No. ML21231A069), Duke Energy Carolinas, LLC (Duke Energy, the licensee) submitted to the U.S. Nuclear Regulatory Commission (NRC) Alternative Request ON-RPI-OMN-28 regarding certain inservice testing (IST) requirements of the American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code) for the IST Programs at Oconee Nuclear Stations, Units 1, 2, and 3 (Oconee) associated with the Sixth 10-Year IST Program interval. Specifically, pursuant to subparagraph (1) in paragraph (z), "Alternatives to codes and standards requirements," of Section 55a, "Codes and standards," in Part 50, "Domestic Licensing of Production and Utilization Facilities," in Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR 50.55a(z)(1)), the licensee requested to implement ASME OM Code Case OMN-28, "Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation," for certain valves at Oconee on the basis that the alternative provides an acceptable level of quality and safety.

The U.S. Nuclear Regulatory Commission staff has determined that additional information is needed as provided below. A clarification call to ensure mutual understanding was conducted on September 16, 2021.

Please respond within 45 days of the date of this e-mail.

RAI No. 1

Alternative Request ON-RPI-OMN-28 proposes that specific valves at Oconee deviate from the position verification requirements (referred to as PI requirements) of the ASME OM Code, Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants," Subsection ISTC, paragraph ISTC-3700, "Position Verification Testing." Please provide the list of valves that is within the scope of Alternative Request ON-RPI-OMN-28. This information may be provided by submittal of the Sixth 10-Year IST Program Plan for Oconee, or by submittal of a separate listing of valves with PI requirements for the Sixth 10-Year IST Program interval.

If you have any questions, please contact me at 301-415-1009 or via e-mail at Shawn.Williams@nrc.gov.

Sincerely,

Shawn Williams, Senior Project Manager
Plant Licensing Branch, II-1

Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos: 50-269, 50-270, and 50-287

cc w/encl: Listserv