OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 (ONS)
SUBSEQUENT LICENSE RENEWAL APPLICATION (SLRA)
SAFETY REVIEW

REQUESTS FOR CONFIRMATION OF INFORMATION
SET #4

Regulatory Basis:

Part 54 of Title 10 of the *Code of Federal Regulations* (10 CFR), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," is designed to elicit application information that will enable the U.S. Nuclear Regulatory Commission (NRC) staff to perform an adequate safety review and the Commission to make the necessary findings. Reliability of application information is important and advanced by requirements that license applications be submitted in writing under oath or affirmation and that information provided to the NRC by a license renewal applicant or required to be maintained by NRC regulations be complete and accurate in all material respects. Information that must be submitted in writing under oath or affirmation includes the technical information required under 10 CFR 54.21(a) related to assessment of the aging effects on structures, systems, and components subject to an aging management review. Thus, both the general submission requirements for license renewal applications and the specific technical application information requirements require that submission of information material to NRC's safety findings (see 10 CFR 54.29 standards for issuance of a renewed license) be submitted by an applicant as part of the application.

Background:

By letter dated June 7, 2021 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML21158A193), as supplemented by letters dated October 22, 2021 (ADAMS Accession No. ML21295A035), October 28, 2021 (ADAMS Accession No. ML21302A208), November 11, 2021 (ADAMS Accession No. ML21315A012), December 2, 2021 (ADAMS Accession No. ML21336A001), December 15, 2021 (ADAMS Accession No. ML21349A005), December 17, 2021 (ADAMS Accession No. ML21351A000), January 7, 2022 (ADAMS Accession No. ML22066A771), January 21, 2022 (ADAMS Accession No. ML22021A000), February 14, 2022 (ADAMS Accession No. ML22066A773), and February 21, 2022 (ADAMS Accession No. ML22052A002), Duke Energy Carolinas, LLC (Duke Energy) submitted to the U.S. Nuclear Regulatory Commission (NRC or staff) an application to renew the Renewed Facility Operating License Nos. DPR-38, DPR-47, and DPR-55 for Oconee Nuclear Station (ONS), Units 1, 2, and 3. Duke Energy submitted the application pursuant to 10 CFR Parts 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," for subsequent license renewal.

Between July 26 and October 8, 2021, the NRC staff conducted audits of Duke Energy's records to confirm information submitted in the ONS subsequent license renewal applicaiotn.

Request:

During the audit, the staff reviewed several documents that contain information which will likely be used in conclusions documented in the Safety Evaluation Report (SER). To the best of the staff's knowledge, this information is not on the docket. Any information used to reach a conclusion in the SER must be included on the docket by the applicant. We request that you

submit confirmation that the information gathered from the documents and listed below is correct or provide the associated corrected information.

Requests for Confirmation of Information (RCIs)

RCI No.	Description	Duke Energy's Response
B2.1.15-1-A	Based on the review of the response to Request for Additional Information (RAI) B2.1.15-1, dated February 14, 2022 (ADAMS Accession No. ML22066A773), the staff noted that the masonry walls in the Turbine Building and the Auxiliary Building are constructed of concrete block and have structural support; shelter, protection; and fire barrier intended functions. The response also states, "Both alignments [AMR items 3.5.1-070 (III.A3.T-12) and 3.3.1-179 (VII.G.A-626)] are utilized to capture all potential aging mechanisms for the Masonry Walls that contain a fire barrier function." Confirm that the Fire Protection program is credited for ensuring that the fire barrier intended function is maintained during the subsequent period of extended operation. Also, confirm that the Masonry Walls program is credited for ensuring that the structural support and the shelter, protection intended functions are maintained during the subsequent period of extended operation for the "masonry wall" component type (two materials – "masonry wall" and "concrete block").	
B2.1.15-2-A	Based on the review of the response to RAI B2.1.15-2, dated February 14, 2022 (ADAMS Accession No. ML22066A773), the staff noted that Armaflex does not have a fire barrier intended function and Subsequent License Renewal Application Section 2.4.8.2 was revised to state that it is not credited as a fire barrier. The response also states, "The Structures Monitoring program is not credited for ensuring the intended function of fire barrier materials." While reviewing the table in Section 4.4 of Enclosure 9.5, "Fire Barrier Penetration Configuration Identification," in implementing procedures MP/1/A/1705/018, MP/2/A/1705/018, and MP/3/A/1705/018, "Fire Protection – Penetration – Fire and Flood Barrier – Inspection and Minor Repair," the staff noted that these implementing procedures appear to include other sealant types that are approved for both fire barriers and flood barriers. Because the above implementing procedures for the Fire Protection program do not appear to be cited or referenced in any other aging management program (i.e., Structures Monitoring program), confirm that the associated inspections conducted under the Fire Protection program are not being credited for the inspections of penetration seals with a flood barrier intended function.	