



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 8, 2015

Mr. Scott Batson  
Site Vice President  
Oconee Nuclear Station  
Duke Energy Carolinas, LLC  
7800 Rochester Highway  
Seneca, SC 29672-0752

SUBJECT: OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 – AUDIT PLAN FOR THE FLOOD HAZARD REEVALUATION REPORT SUBMITTAL RELATING TO THE NEAR-TERM TASK FORCE RECOMMENDATION 2.1 - FLOODING (TAC NOS. MF1012, MF1013, AND MF1014)

Dear Mr. Batson,

This letter documents the U.S Nuclear Regulatory Commission (NRC) staff's plan to perform a regulatory audit of Duke Energy Carolinas, LLC (the licensee) Flood Hazard Reevaluation Report (FHRR) submitted on March 6, 2015, related to the Near-Term Task Force Recommendation 2.1 - Flooding for the Oconee Nuclear Station, Units 1, 2, and 3 (ONS). The audit will be conducted over several months, from roughly April through July, 2015. This technical audit will be performed consistent with NRC Office of Nuclear Reactor Regulation, Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008. The NRC staff will develop an audit summary report to document the results of the interactions with the licensee within 90 days of the completion of the audit.

The audit is intended to support NRC staff reviews of the FHRR and the subsequent issuance of a Staff Assessment. The enclosed audit plan outlines the process that will allow the NRC staff to identify additional information potentially necessary for Duke to supplement the ONS FHRR, and resolve any potential technical concerns. The details of this audit have been discussed with Mr. Arthur Zaremba of your staff.

If you have any questions, please contact me at (301) 415-4032 or by e-mail at Randy.Hall@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Hall".

James R. Hall, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Enclosure:  
Audit Plan

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AUDIT PLAN BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO THE FLOOD HAZARD REEVALUATION REPORT SUBMITTAL  
NEAR-TERM TASK FORCE RECOMMENDATION 2.1 - FLOODING  
DUKE ENERGY CAROLINAS, LLC  
OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3  
DOCKET NOS. 50-269, 50-270, AND 50-287

1.0 BACKGROUND AND AUDIT BASIS

By letter dated March 12, 2012,<sup>1</sup> the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) "Conditions of license" (hereafter referred to as the "50.54(f) letter"). The request was issued in connection with implementing lessons-learned from the 2011 accident at the Fukushima Dai-ichi nuclear power plant, as documented in The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident. Recommendation 2.1 in that document recommended that the staff issue orders to all licensees to reevaluate seismic and flooding for their sites against current NRC requirements and guidance. Subsequent Staff Requirements Memoranda associated with Commission Papers SECY-11-0124 and SECY-11-0137, instructed the NRC staff to issue requests for information to licensees pursuant to 10 CFR 50.54(f).

By letter dated March 6, 2015,<sup>2</sup> Duke Energy Carolinas, LLC (the licensee, Duke) submitted its Flood Hazard Reevaluation Report (FHRR) for the Oconee Nuclear Station, Units 1, 2, and 3 (ONS). The NRC staff has begun its review of the aforementioned submittal and plans to conduct a regulatory audit to inform its development of the staff assessment, identify any similarities/differences with past work completed, and ultimately aid in its review of the licensee's FHRR.

2.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The area of focus for the regulatory audit is the information contained in the ONS FHRR submittal, and all associated and relevant supporting documentation used in the development of the aforementioned documents including, but not limited to, methodology, process information, calculations, computer models, etc. The audit will be conducted and completed over several technical information exchanges that are to be determined, as necessary. This technical audit

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340.

<sup>2</sup> ADAMS Package Accession No. ML15072A099.

will be performed consistent with NRC Office of Nuclear Reactor Regulation, Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008.<sup>3</sup>

### 3.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

For the first interactions associated with this audit, the information to be reviewed and discussed includes seismic and hydraulic analysis that was included in the licensee's FHRR submittal. For subsequent meetings, the information to be audited will include more detailed models, calculations, parameter selection and/or assumptions used in developing the FHRR. Specific information to be audited will be communicated to your staff prior to the second and subsequent technical information exchanges.

### 4.0 NRC AUDIT TEAM

<b>Title</b>	<b>Team Member</b>
Team Leader, NRR/DORL	James (Randy) Hall
Deputy Division Director, NRO/DSEA	Andy Campbell
Branch Chief, NRR/DORL	Robert Pascarelli
Branch Chief, NRR/JLD	Mohamed Shams
Branch Chief, NRO/DSEA	Aida Rivera-Varona
Branch Chief, NRO/DSEA	Chris Cook
Project Manager, NRR/JLD	Robert Kuntz
Project Manager, NRR/DORL	Jeff Whited
Technical Support, NRO/DSEA	Michelle Bensi
Technical Support, NRO/DSEA	Nebiyu Tiruneh
Technical Support, NRO/DSEA	Kenneth Erwin
Technical Support, NRO/DSEA	Barbara Hayes
Technical Support, NRO/DSEA	Michael Willingham

### 5.0 LOGISTICS

The interactions will be conducted from April 2015, to July 2015. Details of these technical interactions have been provided to your staff.

Time Charge Information: The auditors will charge their time in HRMS to MF1012, MF1013, and MF1014. These are fee billable TACs.

### 6.0 DELIVERABLES

Audit team members are requested to provide their observations for input to the Project Manager (Team Leader) for development of the audit report, within 14 days of each interaction with the licensee. The NRC team will develop an audit report to convey the audit results. The report will be placed in ADAMS within 90 days of the completion of the audit, and will be publicly available. The information discussed in these audits may be included, fully or in part, in the development of the NRC technical staff assessment as a result of the FHRR review.

<sup>3</sup> ADAMS Accession No. ML082900195.

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If you have any questions, please contact me at (301) 415-4032 or by e-mail at Randy.Hall@nrc.gov.

Sincerely,  
**/RA/ Jeffrey Whited for**  
James R. Hall, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Enclosure:  
Audit Plan

cc w/encl: Distribution via Listserv

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BHayes, NRO	MWillingham, NRO	JWhited, NRR

**ADAMS Accession No.: ML15118A460**

OFFICE	NRR/DORL/PM	NRR/DORL/LA	NRR/JLD/PM	NRR/DORL/BC	NRR/DORL/PM
NAME	JWhited	SFiguroa	RKuntz (JUrite for)	RPascarelli	JHall (JWhited for)
DATE	05/06/15	05/07/15	05/06/15	05/08/15	05/08/15

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