

May 24, 2005

Mr. D. M. Jamil  
Vice President  
Catawba Nuclear Station  
Duke Energy Corporation  
4800 Concord Road  
York, SC 29745

SUBJECT: CATAWBA NUCLEAR STATION, UNITS 1 AND 2 RE: ISSUANCE OF  
AMENDMENTS (TAC NOS. MC2547 AND MC2548)

Dear Mr. Jamil:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 224 to Renewed Facility Operating License NPF-35 and Amendment No. 219 to Renewed Facility Operating License NPF-52 for the Catawba Nuclear Station, Units 1 and 2. The amendments consist of changes to the Technical Specifications in response to your application dated March 22, 2004, as supplemented by letters dated February 8 and April 7, 2005.

The amendments revise the surveillance frequency from 92 days to 18 months for certain Westinghouse Type AR slave relays and for certain Potter and Brumfield MDR-Series slave relays.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

**/RA/**

Sean E. Peters, Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-413 and 50-414

Enclosures:

1. Amendment No. 224 to NPF-35
2. Amendment No. 219 to NPF-52
3. Safety Evaluation

cc w/encls: See next page

May 24, 2005

Mr. D. M. Jamil  
Vice President  
Catawba Nuclear Station  
Duke Energy Corporation  
4800 Concord Road  
York, SC 29745

SUBJECT: CATAWBA NUCLEAR STATION, UNITS 1 AND 2 RE: ISSUANCE OF  
AMENDMENTS (TAC NOS. MC2547 AND MC2548)

Dear Mr. Jamil:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 224 to Renewed Facility Operating License NPF-35 and Amendment No. 219 to Renewed Facility Operating License NPF-52 for the Catawba Nuclear Station, Units 1 and 2. The amendments consist of changes to the Technical Specifications in response to your application dated March 22, 2004, as supplemented by letters dated February 8 and April 7, 2005.

The amendments revise the surveillance frequency from 92 days to 18 months for certain Westinghouse Type AR slave relays and for certain Potter and Brumfield MDR-Series slave relays.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

**/RA/**

Sean E. Peters, Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-413 and 50-414

Enclosures:

1. Amendment No. 224 to NPF-35
2. Amendment No. 219 to NPF-52
3. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION: See next page

Package Number: ML051100255

Tech Spec Number: ML051470280

Amendment Number: ML051020543

NRR-058

OFFICE	PDII-1/PM	PDII-1/LA	EEIB/SC	IROB/SC	OGC	PDII-1/SC
NAME	SPeters	CHawes	EMarinos	TBoyce	MDuffy	EMarinos
DATE	4/22/05	4/22/05	4/25/05	5/2/05	5/5/05	5/23/05

**OFFICIAL RECORD COPY**

SUBJECT: CATAWBA NUCLEAR STATION, UNITS 1 AND 2 RE: ISSUANCE OF  
AMENDMENTS (TAC NOS. MC2547 AND MC2548)

Date: May 24, 2005

DISTRIBUTION:

PUBLIC

PDII-1 R/F

EHackett

JNakoski

CHawes

OGC

ACRS/ACNW

GHill (4)

TBoyce

PRebstock

SPeters

RidsRgn2MailCenter

DLPMDPR

DUKE ENERGY CORPORATION  
NORTH CAROLINA ELECTRIC MEMBERSHIP CORPORATION  
SALUDA RIVER ELECTRIC COOPERATIVE, INC.  
DOCKET NO. 50-413  
CATAWBA NUCLEAR STATION, UNIT 1  
AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 224  
Renewed License No. NPF-35

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Catawba Nuclear Station, Unit 1 (the facility) Renewed Facility Operating License No. NPF-35 filed by the Duke Energy Corporation, acting for itself, North Carolina Electric Membership Corporation and Saluda River Electric Cooperative, Inc. (licensees), dated March 22, 2004, as supplemented by letters dated February 8 and April 7, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-35 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 224, which are attached hereto, are hereby incorporated into this license. Duke Energy Corporation shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

Evangelos C. Marinos,, Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Technical Specification  
Changes

Date of Issuance: May 24, 2005

DUKE ENERGY CORPORATION  
NORTH CAROLINA MUNICIPAL POWER AGENCY NO. 1  
PIEDMONT MUNICIPAL POWER AGENCY  
DOCKET NO. 50-414  
CATAWBA NUCLEAR STATION, UNIT 2  
AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 219  
Renewed License No. NPF-52

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Catawba Nuclear Station, Unit 2 (the facility) Renewed Facility Operating License No. NPF-52 filed by the Duke Energy Corporation, acting for itself, North Carolina Municipal Power Agency No. 1 and Piedmont Municipal Power Agency (licensees), dated March 22, 2004, as supplemented by letters dated February 8 and April 7, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-52 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 219, which are attached hereto, are hereby incorporated into this license. Duke Energy Corporation shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

Evangelos C. Marinos,, Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Technical Specification  
Changes

Date of Issuance: May 24, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 224

FACILITY OPERATING LICENSE NO. NPF-35

DOCKET NO. 50-413

AND LICENSE AMENDMENT NO. 219

RENEWED FACILITY OPERATING LICENSE NO. NPF-52

DOCKET NO. 50-414

Replace the following pages of the Appendix A Technical Specifications and associated Bases with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3.3.2-9

3.3.6-2

B 3.3.2-45

B 3.3.2-46

B 3.3.2-47

B 3.3.2-48

B 3.3.2-49

B 3.3.6-5

Insert

3.3.2-9

3.3.6-2

B 3.3.2-45

B 3.3.2-46

B 3.3.2-47

B 3.3.2-48

B 3.3.2-49

B 3.3.6-5



SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 224 TO RENEWED FACILITY OPERATING  
LICENSE NPF-35 AND  
AMENDMENT NO. 219 TO RENEWED FACILITY OPERATING LICENSE NPF-52  
DUKE ENERGY CORPORATION, ET AL.  
CATAWBA NUCLEAR STATION, UNITS 1 AND 2  
DOCKET NOS. 50-413 AND 50-414

## 1.0 INTRODUCTION

By letter dated March 22, 2004 (Ref. 1), as supplemented by letters dated February 8 and April 7, 2005 (Ref. 2), Duke Energy Corporation, et al. (DEC, the licensee), submitted a request for changes to the Catawba Nuclear Station, Units 1 and 2, Technical Specifications (TS). The request would change the surveillance frequency for slave relays from 92 days to 18 months. Specifically, the proposed changes would revise TS 3.3.2, "Engineered Safety Features [ESF] Actuation System Instrumentation," and TS 3.3.6, "Containment Air Release and Addition Isolation Instrumentation," to permit an 18-month surveillance interval for certain Westinghouse Type AR slave relays and for certain Potter and Brumfield (P&B) MDR-Series slave relays.

These changes are based upon topical reports that have been accepted (with conditions) in Safety Evaluations (SEs) previously issued by the Nuclear Regulatory Commission (NRC) (Refs. 3, 4, and 5). Those SEs included conditions to be met in plant-specific requests to implement the extended surveillance intervals.

## 2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.36(c)(3), "Surveillance Requirements," states, "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

10 CFR 50.36(c)(3) thus establishes a need for surveillance testing that demonstrates the ability of the associated devices to perform its functions. However, this regulation does not establish schedule-related requirements concerning such testing.

Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," supports the extension of surveillance intervals and states that safety can be improved, equipment degradation

decreased, and an unnecessary burden on personnel resources eliminated by reducing the amount of testing that the TS require during power operation.

The SEs (Refs. 4 and 5) for the Topical Reports concerning Westinghouse Type AR and P&B MDR relays are based on WCAP-13877, Revision 1, "Reliability Assessment of Westinghouse Type AR Relays Used as SSPS Slave Relays" and WCAP-13878, Revision 1, "Reliability Assessment of Potter & Brumfield MDR Series Relays." These SEs establish criteria that must be addressed in plant-specific applications that cite the Topical Reports for support. Revision 1 of each report has been superseded, however, the revisions do not alter the plant-specific criteria established in Refs. 4 and 5.

### 3.0 TECHNICAL EVALUATION

In Attachment 3 of the March 22, 2004, letter, DEC provided a description of the proposed changes and the technical justifications for them. The following is a summary of the issues identified in the SEs for the cited Topical Reports, along with a summary of the licensee's assessment of each issue.

#### 3.1 Westinghouse Type AR Relays

DEC indicated that the plant data have been reviewed and are bounded by the generic analysis contained in WCAP-13877 Revision 2-P-A. The specific relay models to be affected by the proposed changes are Westinghouse type AR440 and Westinghouse type AR880.

SE Criteria:

1. Confirm the applicability of WCAP-13877 analysis to the plant in question.

The licensee indicated that the AR440 and AR880 relays to be affected by the proposed amendment are bounded in WCAP-13877 Revision 2-P-A, and have environmental conditions similar to those of WCAP-13877. Because of these factors, the NRC staff concludes that the conclusions of the WCAP-13877 SE are applicable to the relays in question.

2. Ensure that the contact loading analysis for Type-AR relays has been performed to determine the acceptability of these relays.

The licensee stated that a contact loading analysis has been performed for the relays in question and that the analysis shows that the contacts are adequate for the applications and that the contacts will not be subjected to long-term degradation. Therefore, the NRC staff finds that the conclusions of the WCAP-13877 SE are not compromised by contact loading considerations.

3. Determine the qualified life for the Type AR relays based on plant-specific environmental conditions.

DEC stated that the relays are subjected to environmental conditions comparable to those evaluated in WCAP-13877 Revision 2-P-A, and that the conclusions regarding qualified life for the relays are directly applicable to Catawba. The licensee further

indicated that the evaluation in WCAP-13877 bounds all of the plant-specific environmental conditions. Because the environmental conditions remain bounded, the NRC staff finds that the conclusions of the SE are not compromised by environmental considerations.

4. Establish a program to evaluate the adequacy of the proposed test interval if two or more AR relays fail in a 12-month period.

DEC indicated that if two or more Type AR relays in ESF or interposing relay applications fail in a 12-month period, then it will evaluate and continue to monitor the adequacy of the proposed surveillance test interval relaxation. The licensee will also reevaluate the design, maintenance, and testing of all Type AR relays used in ESF and interposing relay applications.

The licensee also stated that the relays affected by the proposed change are within the scope of the Maintenance Rule program, which implements the requirements of 10 CFR 50.65. This program requires evaluation, cause determination, corrective action, and increased surveillance as appropriate in response to equipment failures.

Additionally, the "two failures within 12 months" criterion includes independent failures at either or both units but not failures at other plants. One failure at Catawba, Unit 1 and one failure at Catawba, Unit 2 would constitute two failures for the purposes of satisfying this criterion. Failures at other plants will be considered in evaluations of relay performance, but would not necessarily trigger the indicated response.

DEC indicated that all failures detected in a 18-month surveillance test will be assumed to have occurred within 12 months. In addition, the licensee indicates that a failure at either unit will be attributed to both units for the purposes of interval reevaluation. Furthermore, the proposed TS amendment is limited to slave relays, but DEC proposed to apply failures of similar relays in interposing relay applications in assessing slave relay performance. The time interval considerations and test sample scope proposed by the licensee, therefore, appear to be conservative relative to the SE requested limits of two failures in 12 months at one plant. Because the program is conservative, the NRC staff finds it acceptable.

In summary, for Westinghouse Type AR Relays, DEC provided adequate responses to the conditions imposed by the SE for WCAP-13877, and indicated that the conditions assumed in the Topical Report bound the conditions anticipated for the relays in question. Therefore, the conclusions of the SE are applicable to the relays in question.

### 3.2 Potter and Brumfield MDR-Series Relays

DEC indicated that the plant data have been reviewed and are bounded in the generic analysis contained in WCAP-13878-P-A Revision 2. The specific relay models to be affected by the proposed change are the P&B MDR model 4121-1, latching with a 118 VAC coil and the model 4103-1, non-latching with a 118 VAC coil.

SE Criteria:

1. Confirm the applicability of WCAP-13878-P-A Revision 2 analyses to the plant in question.

The licensee stated that only the model 4121-1 relays are currently in use, they are bounded by WCAP13878-P-A Revision 2, and they have environmental conditions similar to those in the WCAP. Additionally, the licensee verified that the model 4103-1 relays are also bounded by the WCAP. Therefore, the NRC staff finds that the conclusions of the SE for WCAP-13878 are applicable to the relays in question.

2. Ensure that the procurement program for P&B MDR relays is adequate for detecting the types of failures that are discussed in references 9, 10, 11, and 12 of the SE for WCAP-13878.

Because the licensee asserted that the procurement program for the affected relays meets this requirement and because the procurement must meet the requirements of 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", the NRC staff finds this criterion to be met.

3. Ensure that all pre-1992 P&B MDR relays that are either normally energized or used with a 20 percent duty cycle have been removed from ESFAS applications.

The licensee indicated that none of the affected relays are normally energized nor have a 20 percent duty cycle. Therefore, the NRC staff finds this criterion to be met.

4. Ensure that the contact loading analysis for P&B MDR relays has been performed to determine the acceptability of these relays.

DEC stated that a contact loading analysis has been performed for the relays in question and that the analysis shows that the contacts are adequate for the applications and will not be subjected to long-term degradation. Therefore, the conclusions of the SE for WCAP-13878 are not compromised by contact loading considerations.

5. Establish a program to evaluate the adequacy of the proposed test interval if two or more MDR relays fail in a 12-month period.

The licensee asserted that if two or more MDR relays in ESF applications fail in a 12-month period, then it will evaluate and continue to monitor the adequacy of the proposed surveillance test interval relaxation. Additionally, the design, maintenance, and testing of all MDR relays used in ESF applications will be reevaluated. DEC also stated that the relays affected by the proposed changes are within the scope of the Maintenance Rule program, which implements the requirements of 10 CFR 50.65. That program requires evaluation, cause determination, corrective action, and increased surveillance as appropriate in response to equipment failures.

The licensee has indicated that the "two failures within 12 months" criterion includes independent failures at either or both units but not failures at other plants. One failure at Catawba, Unit 1 and one failure at Catawba, Unit 2 would constitute two failures for the purposes of satisfying this criterion. Failures at other plants would be considered in evaluations of relay performance, but would not necessarily trigger the indicated response.

DEC indicated that all failures detected in a 18-month surveillance test will be assumed to have occurred within 12 months. In addition, it stated that a failure at either unit will be attributed to both units for the purposes of interval reevaluation. Furthermore, the proposed TS amendment is limited to slave relays, but the licensee does not limit consideration to slave relay applications in assessing slave relay performance. The time interval considerations and test sample scope proposed by DEC, therefore, appear to be conservative relative to the SE limits of two failures in 12 months at one plant. Because the program is conservative, the NRC staff finds it acceptable.

In summary, for P&B MDR relays, the licensee has provided adequate responses to the conditions identified in the SE for WCAP-13878 and has indicated that the conditions assumed in the topical report bound the conditions anticipated for the relays in question. Therefore, the NRC staff finds that the conclusions of the SE are applicable to the relays in question.

### 3.3 SR 3.3.2.6 and SR 3.3.6.3

These SRs require the performance of slave relay testing every 92 days. DEC proposed adding an exception to perform these tests every 18 months only for Westinghouse AR and P&B MDR relay types. Because the conditions in the applicable topical reports bound these relay types at Catawba, the NRC staff finds this interval extension to be acceptable.

## 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the South Carolina State official was notified of the proposed issuance of the amendments. The State official had no comments.

## 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (69 FR 55468). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

## 7.0 REFERENCES

1. Letter from Dhiaa M. Jamil, Vice President, Catawba Nuclear Station to USNRC, "Duke Energy Corporation Catawba Nuclear Station, Units 1 and 2 Docket Numbers 50-413 and 50-414 Proposed Technical Specifications Amendments 3.3.2, Engineered Safety Feature Actuation System Instrumentation 3.3.6, Containment Air Release and Addition Isolation Instrumentation," March 22, 2004.
2. Letter from Henry B. Barron, Group Vice President and Chief Nuclear Officer, DEC to USNRC, "Duke Energy Corporation Catawba Nuclear Station, Units 1 and 2 Docket Numbers 50-413 and 50-414 Proposed Technical Specifications Amendments 3.3.2, Engineered Safety Feature Actuation System Instrumentation 3.3.6, Containment Air Release and Addition Isolation Instrumentation Reply to Request for Additional information TAC Numbers MC2547 and MC2548," February 8, 2005.
3. Letter from Stuart A. Richards, USNRC, to H. A. Stepp, "Review of Westinghouse Topical Reports WCAP-13877, Revision 2-P and WCAP-13878-P, Revision 2 on Solid State Protection System (SSPS) Slave Relays," July 12, 2000.
4. Letter from Thomas H. Essing, USNRC, to Louis F. Liberatori, Jr., "Review of Westinghouse Owners' Group Topical Reports WCAP-13877 Revision 1... ESFAS Subgroup Relay Test Interval Extension," October 26, 1998.
5. Letter from Bruce A. Boger, USNRC, to Tom Green, "Review of Westinghouse Electric Corporation Topical Reports WCAP-13878, Revision 1 ... ESFAS Subgroup Test Interval Extension, Westinghouse Owners Group Program MUHP-7040, Revision 0," May 31, 1996.

Principal Contributor: Paul Rebstock, Jr.

Date: May 24, 2005

cc:

Mr. Lee Keller, Manager  
Regulatory Compliance  
Duke Energy Corporation  
4800 Concord Road  
York, South Carolina 29745

Ms. Lisa F. Vaughn  
Duke Energy Corporation  
Mail Code - PB05E  
422 South Church Street  
P.O. Box 1244  
Charlotte, North Carolina 28201-1244

Ms. Anne Cottingham, Esquire  
Winston and Strawn  
1400 L Street, NW  
Washington, DC 20005

North Carolina Municipal Power  
Agency Number 1  
1427 Meadowood Boulevard  
P.O. Box 29513  
Raleigh, North Carolina 27626

County Manager of York County  
York County Courthouse  
York, South Carolina 29745

Piedmont Municipal Power Agency  
121 Village Drive  
Greer, South Carolina 29651

Ms. Karen E. Long  
Assistant Attorney General  
North Carolina Department of Justice  
P.O. Box 629  
Raleigh, North Carolina 27602

NCEM REP Program Manager  
4713 Mail Service Center  
Raleigh, North Carolina 27699-4713

North Carolina Electric Membership Corp.  
P.O. Box 27306  
Raleigh, North Carolina 27611

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
4830 Concord Road  
York, South Carolina 29745

Mr. Henry Porter, Assistant Director  
Division of Waste Management  
Bureau of Land and Waste Management  
Dept. of Health and Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201-1708

Mr. R.L. Gill, Jr., Manager  
Nuclear Regulatory Issues  
and Industry Affairs  
Duke Energy Corporation  
526 South Church Street  
Mail Stop EC05P  
Charlotte, North Carolina 28202

Saluda River Electric  
P.O. Box 929  
Laurens, South Carolina 29360

Mr. Peter R. Harden, IV, Vice President  
Customer Relations and Sales  
Westinghouse Electric Company  
6000 Fairview Road  
12th Floor  
Charlotte, North Carolina 28210

Mr. T. Richard Puryear  
Owners Group (NCEMC)  
Duke Energy Corporation  
4800 Concord Road  
York, South Carolina 29745



cc:

Mr. Richard M. Fry, Director  
Division of Radiation Protection  
NC Dept. of Environment, Health,  
and Natural Resources  
3825 Barrett Drive  
Raleigh, North Carolina 27609-7721

Mr. Henry Barron  
Group Vice President, Nuclear Generation  
and Chief Nuclear Officer  
P.O. Box 1006-EC07H  
Charlotte, NC 28201-1006

Diane Curran  
Harmon, Curran, Spielberg &  
Eisenberg, LLP  
1726 M Street, NW  
Suite 600  
Washington, DC 20036