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July 17, 2006

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** William States Lee III Nuclear Station – Project Number 742  
Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC  
Response to RIS 2006-06, New Reactor Standardization Needed to  
Support the Design-Centered Licensing Review Approach

**Reference:** NRC Regulatory Issue Summary 2006-06, *New Reactor Standardization  
Needed to Support the Design-Centered Licensing Review Approach*;  
dated May 31, 2006

In the reference Regulatory Issue Summary (RIS), the Nuclear Regulatory Commission (NRC) indicated that it is developing its resource estimates and project plan for a Design Centered Review Approach (DCRA) strategy. To support this effort, the NRC identified several specific schedule and standardization information items that would be useful in their preparation.

Duke Energy supports and endorses the design-centered review approach proposed by the NRC. Responses to the specific bulleted items from the RIS are provided in Enclosure 1 for the William States Lee III (Lee Nuclear) COL Project. This information has been coordinated with the AP1000 Reference Plant information.

If you have any questions or need any additional information, please contact Peter Hastings at (980) 373-7820.

Sincerely,

Henry B. Barron

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Enclosure: Response to RIS-2006-06

xc: S. D. Bloom, NRC/HQ  
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**Enclosure 1**  
**Lee COL Project Response to NRC RIS 2006-06**  
**New Reactor Standardization Needed to Support the**  
**Design-Centered Licensing Review Approach**

Each RIS 2006-06 information request is addressed below. The information provided in response to the request has been coordinated with the AP1000 Reference Plant response.

Information Request #1: Whether applicants for the four designs discussed in this RIS will be organized into design-centered working groups (DCWGs); if so, the schedule for such organization and, if a single point of contact is designated for the DCWG, the contact's identity.

Response: Duke Energy intends to submit a combined license application for two new reactors of the AP1000 design. The companies currently identified as also having intent to submit a combined license application for the AP1000 design have organized into a DCWG, as discussed with the NRC Staff previously.

Peter Hastings of Duke Energy has been identified as the AP1000 Reference Plant Licensing Lead for NuStart and NRC point of contact for the AP1000 DCWG.

Information Request #2: If a design-centered program is followed for a particular design, which applicant referencing the design will be designated as the R-COL applicant. In addition, when will (month and year) each of the COL applications be submitted for review?

Response: For the new reactors of the AP1000 design, the reference combined license (R-COL) applicant will be the Bellefonte Project, as discussed with the NRC Staff previously (each currently declared AP1000 applicant is a member of NuStart). The Lee Nuclear Project COL application is scheduled for submittal in October 2007. The Bellefonte Project COL application is expected to be the earliest COL application for the AP1000 design. This date is, however, dependent on several key assumptions. This is further addressed in the Bellefonte Project R-COL response to this RIS.

Information Request #3: Whether applicants implementing the DCRA intend to provide RAI responses within the typical 30-day period.

Response: For requests for additional information (RAIs) concerning standardized content, the Lee Nuclear Project expects to provide conforming or clarifying responses, as applicable, within 30 days or less of the R-COL application RAI responses. For plant-specific RAIs, the Lee Nuclear Project expects to provide most request for additional information (RAI) responses within a typical 30-day period. Longer periods may also be necessary for RAIs requiring substantial new evaluation or analysis, or

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consisting of a substantial number of questions. When it is determined the typical 30-day response period cannot be met, the 30-day response will provide a response plan and schedule. Additionally, a typical 30-day period would be contingent on pre-request discussions between NRC and Duke Energy and/or industry representatives so that the information needs included within the RAIs are well understood (similar to the process utilized on the three original ESP application reviews and on recent DC application reviews).

**Information Request #4:** To what degree standardization will be achieved, appropriately documented, and replicated in COL applications. Specifically, what portions of the R-COL application (chapter by chapter, section by section, subsection by subsection) will be standardized (i.e., replicated verbatim) in S-COL applications and what portions of the application are likely to be site-specific.

**Response:** Duke Energy supports and endorses the design-centered review approach proposed by the NRC. Standardization is expected to be substantial for the AP1000 COL applications as addressed in the Bellefonte Project R-COL response to this RIS, which included a current AP1000 standardization matrix (on a subsection-by-subsection basis).

The Lee Nuclear Project expects to incorporate standardized material to the full extent practical.

**Information Request #5:** Whether, for each design-centered program, the vendor and applicants intend to submit pre-application topical reports for staff review. If so, how many? For each such report anticipated, please summarize the report scope and content and the proposed submittal schedule.

**Response:** Submittal of pre-application topical reports for the AP1000 DCWG is addressed in the Bellefonte Project R-COL response to this RIS.

To date, Duke Energy has not identified any site-specific pre-application topical reports for staff review. Future discussions with the NRC Staff may result in identification of additional site-specific information for early submittal.

**Information Request #6:** Whether any applicants intend to apply for an ESP prior to submitting their COL applications. If so, when (month and year) would the proposed ESP be submitted to the NRC for review?

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Response: The Lee Nuclear Project does not intend to apply for an early site permit (ESP) prior to submitting the COL application. (Note that Duke Energy separately has identified other possible future ESPs for different sites, but those dates have not been established.)