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September 13, 2006

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTENTION: Document Control Center

SUBJECT: Duke Power Company LLC d/b/a
Duke Energy Carolinas, LLC (DUKE)
Catawba Nuclear Station Units 1 & 2
Docket Nos. 50-413 and 50-414
ECCS Water Management Initiative

On May 11, 2006, the NRC held a meeting with representatives of the Nuclear Energy Institute (NEI) and the PWR Owners Group to discuss possible safety enhancements to PWR design and operation that could result from changes that would extend the post-LOCA injection phase, i.e., delay the onset of the containment recirculation phase. The NRC expressed an interest in pilot applications of this "water management" initiative that would eliminate automatic containment spray actuation for LOCA events. Duke is interested in pursuing the proposal to delete the auto-actuation function for containment spray for its Catawba Nuclear Station based on the possible decrease in Core Damage Frequency (CDF).

Accordingly, Duke requests that the Catawba Nuclear Station Units 1 & 2 be considered for pilot plant status for implementation of the ECCS Water Management Initiative for PWRs with ice condenser containments. The proposed scope of the Licensing Amendment Request (LAR) would include:

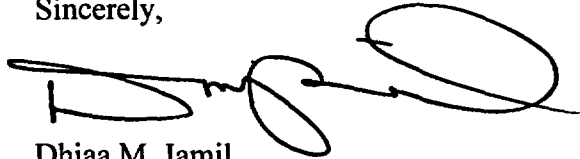
- deleting of the auto-actuation function for containment spray
- lowering of Refueling Water Storage Tank (FWST) Lo and Lo-Lo level setpoints,
- associated Emergency Operating Procedure changes,
- possible increasing of the minimum FWST water volume.

These changes are designed to increase the water available for emergency core cooling as well as reduce debris loading on the containment sump strainer. These changes will also assist in the resolution of a site nonconformance issue associated with small break LOCA events. The anticipated date for submitting the LAR is March 2007.

As part of our participation as the pilot plant, it is anticipated that customary review fees will be waived.

Please direct any inquires to Randy Hart, Catawba Regulatory Compliance, at (803) 831-3622.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dhiam Jamil', with a large, stylized flourish at the end.

Dhiaa M. Jamil

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