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October 27, 2008

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Site, Units 1, 2, and 3
Docket Numbers 50-269, 50-270, and 50-287
Requests for Additional Information for Proposed License Amendment Request to Revise
the Technical Specifications for AREVA NP Mark-B-HTP Fuel and for Methodology
Report DPC-NE-2015-P "Mark-B-HTP Fuel Transition Methodology"
License Amendment Request No. 2007-12

Duke Energy Carolinas, LLC (Duke) submitted a license amendment request (LAR) dated October 22, 2007, for the Oconee Nuclear Station Renewed Facility Operating License (FOL) and Technical Specifications (TS) pursuant to 10 CFR 50.90. Specifically, Duke requested NRC review and approval of methodology report DPC-NE-2015-P, "Mark-B-HTP Fuel Transition Methodology" and revisions to Technical Specifications 2.1.1.2 and 5.6.5.b. These revisions will allow the use of the AREVA NP Mark-B-HTP fuel design at the Oconee Nuclear Station beginning with Oconee Unit 2 Cycle 24 in December 2008. The Mark-B-HTP design is currently in use at several B&W design reactors.

Duke met with the NRC on March 3, 2008, to facilitate the LAR review. In emails dated May 8, 2008, and May 28, 2008, Duke received requests for additional information (RAIs). Duke submitted responses to these RAIs on July 14, 2008.

On August 27, 2008, following a conference call between Duke and the NRC, additional clarification was requested to the earlier responses to questions 6, 9, and 10. Duke responded to this RAI on September 17, 2008.

During an October 23, 2008, conference call the NRC identified an inconsistency dealing with the cladding corrosion analysis in which they noted that Duke had not docketed the agreement, either in the LAR or supplemental RAI responses, that credit would not be taken for any reduction in the COROS02 corrosion model. The NRC requested that Duke submit a formal response addressing this issue. Consequently, this letter confirms that Duke will take no reduction in the COROS02 corrosion model calculated oxide thickness. In addition, the following clarifying statement will be placed in Section 5.1 of DPC-NE-2015 (Revision 5-2 on

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page 5-2): *“The COROS02 calculated results are used, with no reduction, as the best estimate oxide thickness, and the best estimate oxide thickness must be less than ...[AREVA Proprietary information withheld].”*

If you have any questions in regard to this letter, please contact Stephen C. Newman, Regulatory Compliance Lead Engineer, Oconee Nuclear Station, at (864) 885-4388.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 27, 2008.

Very sincerely yours,

A handwritten signature in black ink, appearing to read 'Dave Baxter', with a stylized flourish at the end.

Dave Baxter, Vice President
Oconee Nuclear Station

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bc:

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