



DAVE BAXTER
Vice President
Oconee Nuclear Station

Duke Energy Corporation
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October 28, 2008

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

Attention: Document Control Desk

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Numbers 50-269, 50-270, and 50-287
License Amendment Request for Reactor Protective System/Engineered
Safeguards Protective System Digital Upgrade, Technical Specification Change
(TSC) Number 2007-09, Supplement 9

On January 31, 2008, Duke Energy Carolinas, LLC (Duke) submitted a License Amendment Request (LAR) to address replacement of the existing Oconee Nuclear Station (ONS) analog based Reactor Protective System (RPS) and Engineered Safeguards Protective System (ESPS) with a digital computer based RPS/ESPS. Duke docketed most of the technical documents listed in Table 1-2 of the LAR in Supplement 1 dated April 3, 2008. In some cases where the document's date of availability was not known, Duke indicated the date would be determined. During subsequent discussions with NRC Staff, Duke agreed to provide factory acceptance test (FAT) procedures (Table 1-2, Item 16.a) by electronic mail as they become available and then docket within two weeks. The FAT procedures Duke provided by electronic mail on October 19, 20, 21, and 23, 2008, are provided in Enclosure 3.

Enclosure 2 identifies test cases that address software integration testing requirements for the ESFAS Functional FAT. These test cases address testing requirements that could be performed using AREVA NP's simulation validation tool.

The documents included in Enclosure 3 are classified by AREVA NP as proprietary. The appropriate affidavits by AREVA NP are provided in Enclosure 1 in accordance with the provisions of 10 CFR 2.390.

If there are any questions regarding this submittal, please contact Boyd Shingleton at (864) 885-4716.

Enclosure 3 to this letter contains proprietary information.
Withhold from public disclosure under 10 CFR 2.390.
Upon removal of Enclosure 3, this letter is uncontrolled.

A001
NRR

U. S. Nuclear Regulatory Commission
October 28, 2008
Page 2

I declare under penalty of perjury that the foregoing is true and correct. Executed on
October 28, 2008.

Very truly yours,

A handwritten signature in black ink, appearing to read "Dave Baxter", with a large, stylized flourish extending from the end of the name.

Dave Baxter, Vice President
Oconee Nuclear Station

Enclosures:

1. AREVA NP Affidavits
2. Test Case Identification
3. AREVA NP Documents - Proprietary

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U. S. Nuclear Regulatory Commission
October 28, 2008
Page 3

cc: w/o enclosures

Mr. L. N. Olshan, Project Manager
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-14 H25
Washington, D. C. 20555

L. A. Reyes, Regional Administrator
U. S. Nuclear Regulatory Commission - Region II
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303

Mr. G. A. Hutto
Senior Resident Inspector
Oconee Nuclear Station

S. E. Jenkins, Manager
Infectious and Radioactive Waste Management Section
2600 Bull Street
Columbia, SC 29201

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bcc: w/o enclosures

R. W. Cornett
B. R. Loftis
B. M. Thomas
J. L. Abbott
B. G. Davenport
J. E. Burchfield
C. E. Curry
L. F. Vaughn
D. B. Coyle
E. L. Anderson
R. L. Gill – NRI&A
R. D. Hart – CNS
K. L. Ashe - MNS
R. V. Gambrell
D. C. Richardson
M. E. Bailey
NSRB, EC05N
File - T.S. Working
BWOOG Tech Spec Committee (5)

w/ enclosures
ONS Document Management
ELL, ECO50

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License Amendment Request No. 2007-09, Supplement 9
October 28, 2008

Enclosure 1

AREVA NP Affidavit for Enclosure 3 Documents

5. This Document has been made available to the U S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information".

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
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8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

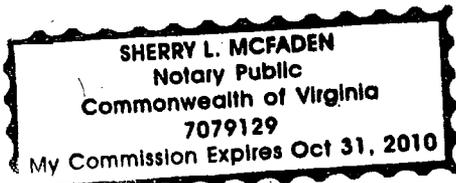
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Marilyn Buzzard

SUBSCRIBED before me on this 26
day of September, 2008.

S. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA



AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
)
CITY OF LYNCHBURG) ss.

1. My name is Mark J. Burzynski. I am Manager, Product Licensing, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information provided to the NRC in support of a Duke Power Company LLC License Amendment Request for Oconee Nuclear Station, Units 1, 2, and 3 (Docket Numbers 50-269, 50-270, and 50-287) entitled *Reactor Protective System/Engineered Safeguards Protective System Digital Upgrade, Technical Specification Change Number 2007-09*. The following AREVA NP document is provided and referred to herein as the "Document."

- AREVA NP document 62-9078736-000, Small Break LOCA Factory Acceptance Test Specification

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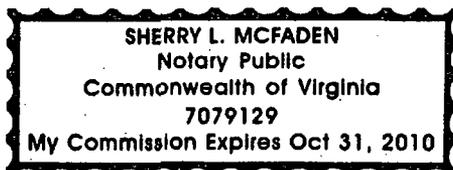
Mary Burzynski

SUBSCRIBED before me on this 23rd

day of September, 2008.

Sherry L. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA



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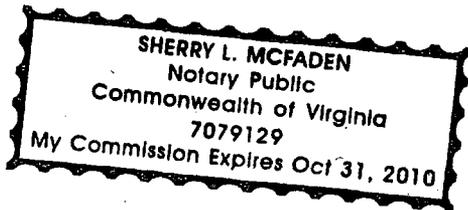
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Mandy Burzynski

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Sherry L. McFaden

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AFFIDAVIT

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- AREVA NP document 62-9065544-000, Gateway to OAC Factory Acceptance Test Specification

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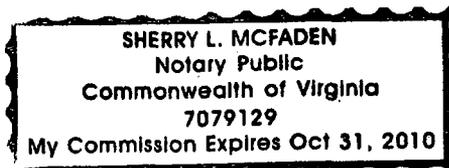
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Mandy Buzgaster

SUBSCRIBED before me on this 22nd
day of September, 2008.

Sherry L. McFaden

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- AREVA NP document 63-9014397-000, One Pump Coast Down Factory Acceptance Test Procedure

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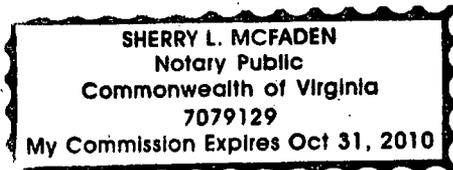
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Mandy Brzezinski

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Sherry L. McFaden

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- AREVA NP document 62-9078508-000, One Pump Coast Down Factory Acceptance Test Specification

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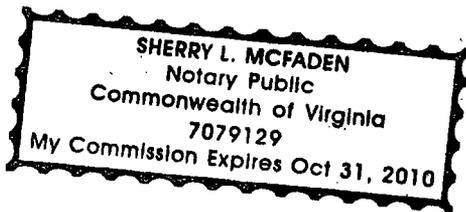
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- AREVA NP document 63-9067378-000, GSM Functional Test Procedure

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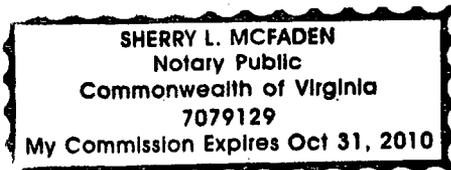
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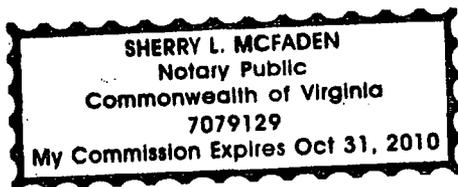
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Marky Bourzard

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3. I am familiar with the AREVA NP information provided to the NRC in support of a Duke Power Company LLC License Amendment Request for Oconee Nuclear Station, Units 1, 2, and 3 (Docket Numbers 50-269, 50-270, and 50-287) entitled *Reactor Protective System/Engineered Safeguards Protective System Digital Upgrade, Technical Specification Change Number 2007-09*. The following AREVA NP document is provided and referred to herein as the "Document."

- AREVA NP document 63-9013619-000, RPS/ESFAS Hardware Failure Factory Acceptance Test Procedure

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8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

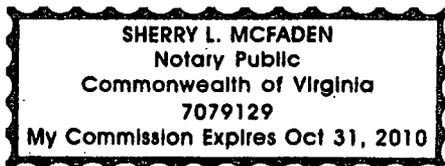
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Mandy Benzinger

SUBSCRIBED before me on this 23rd
day of September, 2008.

Sherry L. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA



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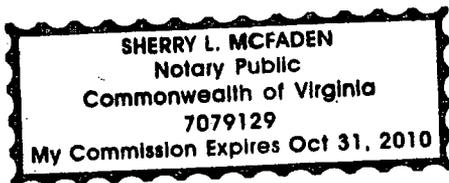
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Mandy Bouzard

SUBSCRIBED before me on this 26th
day of September, 2008.

Sherry L. McFaden

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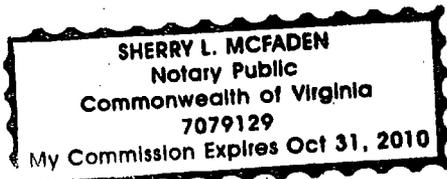
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Mandy Brumby

SUBSCRIBED before me on this 26
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S MCFADEN

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA



AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
)
CITY OF LYNCHBURG) ss.

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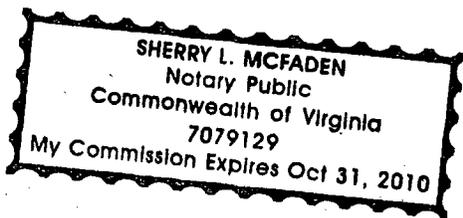
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Wendy Burzynski

SUBSCRIBED before me on this 24th
day of September, 2008.

Sherry L. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA



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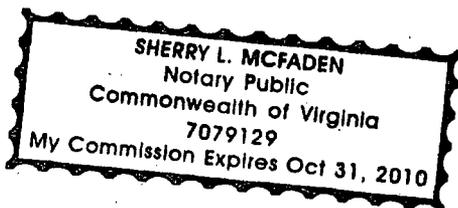
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Marky Buzynski

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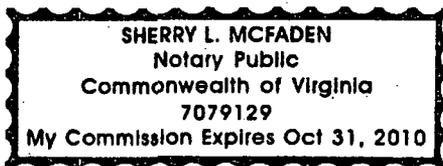
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Marty Benzoni

SUBSCRIBED before me on this 23rd
day of September, 2008.

Sherry L. McFaden

NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA



Enclosure 2

The following test cases address Oconee application software integration testing requirements that could be performed during the implementation phase using SIVAT. The specific test cases are described in AREVA NP document 62-9070978-000, Oconee Nuclear Station, Unit 1 RPS/ESFAS Controls Upgrade ESFAS Factory Acceptance Test Functional Test Specification.

ESFAS Trip Function	Test Cases
ESFAS Trip #1 (Attachment 1)	System Test - Acquisition Set 1 Cases 1 through 13 (Test Specification Sections 2.1.3 – 2.1.15)
	System Test - Acquisition Set 2 Cases 1 through 13 (Test Specification Sections 2.2.3 – 2.2.15)
	Voter Test - Voter ODD1 Test Cases 1 through 6 (Test Specification Sections 3.1.2 – 3.1.7)
	Voter Test – Voter ODD1 Channel 1 Output Test Case 1 (Test Specification Section 3.2.3)
	Voter Test - Voter ODD2 Test Cases 1 through 6 (Test Specification Sections 3.3.3 – 3.3.8)
	Voter Test – Voter ODD2 Channel 1 Output Test Case 1 (Test Specification Section 3.4.3)
	Voter Test - Voter EVEN1 Test Cases 1 through 6 (Test Specification Sections 3.5.2 – 3.5.7)
	Voter Test – Voter EVEN1 Channel 2 Output Test Case 1 (Test Specification Section 3.6.2)
	Voter Test - Voter EVEN2 Test Cases 1 through 6 (Test Specification Sections 3.7.3 – 3.7.8)
	Voter Test – Voter EVEN2 Channel 2 Output Test Case 7 (Test Specification Section 3.8.2)

ESFAS Trip Function	Test Cases
ESFAS Trip #2 (Attachment 2)	System Test - Acquisition Set 1 Cases 1 through 16 (Test Specification Sections 2.1.3 – 2.1.18)
	System Test - Acquisition Set 2 Cases 1 through 16 (Test Specification Sections 2.2.3 – 2.2.18)
	Voter Test - Voter ODD1 Test Cases 1 through 7 (Test Specification Sections 3.1.3 – 3.1.9)
	Voter Test - Voter ODD2 Test Cases 1 through 7 (Test Specification Sections 3.2.3 – 3.2.9)
	Voter Test - Voter EVEN1 Test Cases 1 through 7 (Test Specification Sections 3.3.3 – 3.3.9)
	Voter Test - Voter EVEN2 Test Cases 1 through 7 (Test Specification Sections 3.4.3 – 3.4.9)
ESFAS Trip #3 (Attachment 3)	System Test - Acquisition Set 1 Cases 1 through 13 (Test Specification Sections 2.1.3 – 2.1.15)
	System Test - Acquisition Set 2 Cases 1 through 13 (Test Specification Sections 2.2.3 – 2.2.15)
	Voter Test - Voter ODD1 Test Cases 1 through 6 (Test Specification Sections 3.1.2 – 3.1.7)
	Voter Test – Voter ODD1 Channel 5 Output Test Case 1 (Test Specification Section 3.2.3)
	Voter Test - Voter ODD2 Test Cases 1 through 6 (Test Specification Sections 3.3.3 – 3.3.8)
	Voter Test – Voter ODD2 Channel 5 Output Test Case 1 (Test Specification Section 3.4.3)
	Voter Test - Voter EVEN1 Test Cases 1 through 6 (Test Specification Sections 3.5.3 – 3.5.8)
	Voter Test – Voter EVEN1 Channel 6 Output Test Case 1

ESFAS Trip Function	Test Cases
	(Test Specification Section 3.6.3)
	Voter Test - Voter EVEN2 Test Cases 1 through 6 (Test Specification Sections 3.7.3 – 3.7.8)
	Voter Test – Voter EVEN2 Channel 6 Output Test Case 1 (Test Specification Section 3.8.3)
ESFAS Trip #4 (Attachment 4)	System Test - Acquisition Set 1 Cases 1 through 13 (Test Specification Sections 2.1.3 – 2.1.15)
	System Test - Acquisition Set 2 Cases 1 through 13 (Test Specification Sections 2.2.3 – 2.2.15)
	Voter Test - Voter ODD1 Test Cases 1 through 7 (Test Specification Sections 3.1.3 – 3.1.9)
	Voter Test - Voter ODD2 Test Cases 1 through 7 (Test Specification Sections 3.2.3 – 3.2.9)
	Voter Test - Voter EVEN1 Test Cases 1 through 7 (Test Specification Sections 3.3.3 – 3.3.9)
	Voter Test - Voter EVEN2 Test Cases 1 through 7 (Test Specification Sections 3.4.3 – 3.4.9)
ESFAS Trip #19 (Attachment 5)	None
ESFAS Trip: Signal Failure Section (Attachment 6)	None

Enclosure 3

AREVA NP Documents

Document Name (Item number correlates to Table 1-2 of RPS/ESPS LAR Enclosure 1)	Document Number
16.a FAT Procedures	
Small Break LOCA Factory Acceptance Test Procedure	AREVA NP Document No. 63-9014398-000
Small Break LOCA Factory Acceptance Test Specification	AREVA NP Document No. 62-9078736-000
Gateway to OAC Factory Acceptance Test Procedure	AREVA NP Document No. 63-9070638-000
Gateway to OAC Factory Acceptance Test Specification	AREVA NP Document No. 62-9065544-000
One Pump Coast Down Test Procedure	AREVA NP Document No. 63-9014397-000
One Pump Coast Down Test Specification	AREVA NP Document No. 62-9078508-000
GSM SW Functional Test Procedure	AREVA NP Document No. 63-9067378-000
GSM SW Functional Test Specification	AREVA NP Document No. 62-9066853-000
RPS/ESFAS Hardware Failure Testing Procedure	AREVA NP Document No. 63-9013619-000
ESFAS SW Functional Test Procedure	AREVA NP Document No. 63- 9013611-000
ESFAS SW Functional Test Specification	AREVA NP Document No. 62-9070978-000
Supplemental ESF Hardware Failure Testing Procedure	AREVA NP Document No. 63-9014387-000
RPS Response Time Testing Procedure	AREVA NP Document No. 63-9013943-000
ESF Response Time Testing Procedure	AREVA NP Document No. 63-9013944-000