Bryan J. Dolan
VP, Nuclear Plant Development

Duke Energy
EC09D/ 526 South Church Street
Charlotte, NC 28201-1006

Mailing Address:
P.O. Box 1006 – EC09D
Charlotte, NC 28201-1006

704-382-0605

bjdolan@duke-energy.com

November 4, 2008

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

Subject: Duke Energy Carolinas, LLC.
William States Lee III Nuclear Station - Docket Nos. 52-018 and 52-019
AP1000 Combined License Application for the William States Lee III Nuclear Station Units 1 and 2
Response to Request for Additional Information (RAI No. 920)
Ltr # WLG2008.11-01

Reference: Letter from Brian Anderson (NRC) to Peter Hastings (Duke Energy), *Request for Additional Information Letter No. 031 Related to SRP Section 13.01.02-13.01.03 for the William States Lee III Units 1 and 2 Combined License Application*, dated October 3, 2008.

This letter provides the Duke Energy response to the Nuclear Regulatory Commission's requests for additional information (RAIs) included in the referenced letter.

Responses to the NRC information requests described in the referenced letter are addressed in separate enclosures, which also identify associated changes, when appropriate, that will be made in a future revision of the Final Safety Analysis Report for the Lee Nuclear Station.

If you have any questions or need any additional information, please contact Peter S. Hastings, Nuclear Plant Development Licensing Manager, at 980-373-7820.

Bryan J. Dolan
Vice President
Nuclear Plant Development

D093
NRO

Enclosures:

1) Duke Energy Response to Request for Additional Information Letter 031, RAI 13.01.02-13.01.03-001
2) Duke Energy Response to Request for Additional Information Letter 031, RAI 13.01.02-13.01.03-002
3) Duke Energy Response to Request for Additional Information Letter 031, RAI 13.01.02-13.01.03-003
4) Duke Energy Response to Request for Additional Information Letter 031, RAI 13.01.02-13.01.03-004

AFFIDAVIT OF BRYAN J. DOLAN

Bryan J. Dolan, being duly sworn, states that he is Vice President, Nuclear Plant Development, Duke Energy Carolinas, LLC, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this supplement to the combined license application for the William States Lee III Nuclear Station and that all the matter and facts set forth herein are true and correct to the best of his knowledge.

Bryan J. Dolan

Subscribed and sworn to me on Nov. 4, 2008

Elaine Falcone

Notary Public

My commission expires: Feb. 27, 2011

SEAL

xc (w/o enclosures):

Michael Johnson, Director, Office of New Reactors
Gary Holahan, Deputy Director, Office of New Reactors
David Matthews, Director, Division of New Reactor Licensing
Scott Flanders, Director, Site and Environmental Reviews
Glenn Tracy, Director, Division of Construction Inspection and Operational Programs
Charles Ader, Director, Division of Safety Systems and Risk Assessment
Michael Mayfield, Director, Division of Engineering
Luis Reyes, Regional Administrator, Region II
Loren Plisco, Deputy Regional Administrator, Region II
Thomas Bergman, Deputy Division Director, DNRL
Stephanie Coffin, Branch Chief, DNRL

xc (w/enclosures):

Brian Hughes, Senior Project Manager, DNRL
Brian Anderson, Project Manager, DNRL

Lee Nuclear Station Response to Request for Additional Information (RAI)

RAI Letter No. 031

NRC Technical Review Branch: **Operating License and Human Performance Branch (COLP)**

Reference NRC RAI Number(s): **13.01.02-13.01.03-001**

NRC RAI:

Standard Review Plan Section 13.1.2 – 13.1.3, "Operating organization," section I.4 requests the applicant provide the applicant's commitment to meet the guidelines of Regulatory Guide 1.8 for its operating organization. Section I.B.8 requests the applicant provide the education, training, and experience requirements (qualification requirements) established by the applicant for filling each management, operating, technical, and maintenance position category in the operating organization above should be described. This includes the personnel who will do the preoperational and startup tests. Section 13.1.3.1 of the application states "Qualifications of managers, supervisors, operators, and technicians of the operating organization meet the qualification requirements in education and experience for those described in ANSI/ANS-3.1-1993 (Reference 201), as endorsed and amended by Regulatory Guide 1.8." What are the qualification requirements for the remainder of the operating organization and those personnel who will conduct the preoperational and startup tests?

Duke Energy Response:

The referenced NUREG-0800 Section 13.1.2-13.1.3, Subsection I.4, does not exist in the current revision of NUREG-0800 (Revision 6 of March 2007 for Section 13.1.2-13.1.3). However, the subject matter in question, is located in Subsection I.1.D of Revision 6. Additionally, Section I.B.8 does not exist in Revision 6 of the SRP, but the subject matter in question corresponds to Section I.2.H of Revision 6.

The station operating organization positions are described in FSAR Section 13.1.2 and meet the requirement of SRP Section I.2.C. SRP Section I.2.C lists the plant positions for which descriptions of functions, responsibilities, and authorities are required. The quality assurance supervisor position is not described because that position is not part of plant staff. Additionally, technician positions are described for the functional areas of radiation protection, chemistry, and maintenance. The qualification requirements of the positions described in FSAR Section 13.1.2 are described in ANSI/ANS-3.1 with the exception of the engineer in charge of fire protection. FSAR Subsection 13.1.3.1 commits to meeting ANSI/ANS-3.1 as endorsed by RG 1.8. The engineer in charge of fire protection qualification requirements are addressed in FSAR Subsection 13.1.2.1.2.9. No other currently-identified positions in the operating organization remain for which qualification requirements are required. FSAR Subsection 13.1.3.1 will be revised to apply comparable position qualifications from ANSI/ANS-3.1 as guidance where identified positions are not described explicitly by ANSI/ANS-3.1. This FSAR change is shown in the response to RAI 13.01.01-004 of NRC Letter 029.

The response to RAI 13.01.01-004 of NRC Letter 029 addresses the qualification requirements of personnel who will conduct the preoperational and startup tests. Qualification requirements for personnel of the plant test and operation (PT&O) organization involved in preoperation and startup testing programs are addressed in FSAR Subsection 14.2.2.2, PT&O Organization Personnel Qualifications and Training. Additional discussion is being added to FSAR Appendix 13AA, also as indicated in letter 29, to clarify the location of qualification requirements for personnel who will conduct the preoperational and startup tests.

Associated Revision to the Lee Nuclear Station Final Safety Analysis Report:

FSAR Chapter 13, Subsection 13.1.3.1 is revised as indicated in the response to NRC Letter 029, RAI 13.01.01-004.

FSAR Chapter 13, Appendix 13AA is be revised by adding new subsection 13AA.1.1.1.5, as indicated in the response to NRC Letter 029, RAI 13.01.01-004.

Attachments:

None

Lee Nuclear Station Response to Request for Additional Information (RAI)

RAI Letter No. 031

NRC Technical Review Branch: **Operating License and Human Performance Branch (COLP)**

Reference NRC RAI Number(s): **13.01.02-13.01.03-002**

NRC RAI:

Standard Review Plan Section 13.1.2 – 13.1.3, "Operating Organization," section I.B.3 requests the applicant provide a description, for each position, where applicable, [of] required interfaces with offsite personnel or positions identified in Section 13.1.1 of the application. Such interfaces include defined lines of reporting responsibilities (e.g., from the plant manager to the immediate superior), lines of authority, and communication channels. Either identify where this information is in the application, provide the information, or justify why it is not needed.

Duke Energy Response:

The referenced NUREG-0800 Section 13.1.2-13.1.3, Subsection I.B.3, does not exist in the current revision of NUREG-0800 (Revision 6 of March 2007 for Section 13.1.2-13.1.3). However, the subject matter in question is located in Subsection I.2.C of Revision 6.

Operating organization descriptions are provided in FSAR Section 13.1.2. Positions include the plant manager, managers, functional managers, supervisors, operators, and technicians to satisfy the list of positions required by SRP Subsection I.2.C. Applicable interfaces with offsite personnel or positions identified in Section 13.1.1 are shown in Figure 13.1-201. Figure 13.1-201 and Figure 13.1-202 include lines of authority and/or communication between positions having direct reporting responsibilities or communication requirements. For example, the engineer in charge of fire protection reports directly to the funcitonal manager of engineering programs but has communication responsibilities with the manager of operations. Additionally, reporting responsibilites and applicable lines of communication for the various position descriptions are described throughout FSAR Subsection 13.1.2.

Associated Revision to the Lee Nuclear Station Final Safety Analysis Report:

None

Attachments:

None

Lee Nuclear Station Response to Request for Additional Information (RAI)

RAI Letter No. 031

NRC Technical Review Branch: **Operating License and Human Performance Branch (COLP)**

Reference NRC RAI Number(s): **13.01.02-13.01.03-003**

NRC RAI:

Standard Review Plan Section 13.1.2 – 13.1.3, "Operating Organization," section I.B.5 requests the applicant provide a description of the extent and nature of the participation of the plant operating and technical staff in the initial test program. Either identify where this information is in the application, provide the information, or justify why it is not needed.

Duke Energy Response:

The referenced NUREG-0800 Section 13.1.2-13.1.3, Subsection I.B.5, does not exist in the current revision of NUREG-0800 (Revision 6 of March 2007 for Section 13.1.2-13.1.3). However, the subject matter in question is located in Subsection I.2.E of Revision 6.

FSAR Appendix 13AA, Subsection 13AA.1.1.1.2.2 provides the requested information in the following statement. "To improve operational experience, operations and technical staff are used as support in conducting the test program and in reviewing test results." Additionally, FSAR Subsection 14.2.2.1.4 addresses the importance of using operations personnel in testing activities and makes it a responsibility of the functional manager in charge of startup such that operations personnel will gain the experience and knowledge of preoperational and startup testing.

Associated Revision to the Lee Nuclear Station Final Safety Analysis Report:

None

Attachments:

None

Lee Nuclear Station Response to Request for Additional Information (RAI)

RAI Letter No. 031

NRC Technical Review Branch: **Operating License and Human Performance Branch (COLP)**

Reference NRC RAI Number(s): **13.01.02-13.01.03-004**

NRC RAI:

Standard Review Plan Section 13.1.2 - 13.13, "Operating Organization," section I.B.6 and RG 1.206, section C.I.13.1.2.2(3), "Plant Personnel Responsibilities and Authorities" ask the applicant, if the station contains, or there are plans that it contain, power generating facilities other than those specified in the application, including nonnuclear units, interfaces with the organizations operating the other facilities and to describe any proposed sharing of personnel between the units, a description of their duties, and the proportion of their time that they routinely be assigned to nonnuclear units. Either identify where this information is in the application, provide the information, or justify why it is not needed.

Duke Energy Response:

The referenced NUREG-0800 Section 13.1.2-13.1.3, Subsection I.B.6, does not exist in the current revision of NUREG-0800 (Revision 6 of March 2007 for Section 13.1.2-13.1.3). However, the subject matter in question is located in Subsection I.2.F of Revision 6.

As shown in FSAR Figure 1.1-202, Site Layout, the Lee Nuclear site will contain two AP1000 units and the required construction and support facilities. No power generating facilities other than those specified in the application are planned for the Lee Nuclear Site.

Associated Revision to the Lee Nuclear Station Final Safety Analysis Report:

None

Attachments:

None