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November 18, 2008

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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
Partial Response to Request for Additional Information (RAI No. 919)
Ltr # WLG2008.11-15

Reference: Letter from Brian Anderson (NRC) to Peter Hastings (Duke Energy),
*Request for Additional Information Letter No. 030 Related to SRP Section
13.01.01 for the William States Lee III Units 1 and 2 Combined License
Application*, dated October 3, 2008.

This letter provides the Duke Energy's partial response to the Nuclear Regulatory Commission's requests for additional information (RAIs) included in the referenced letter. Responses to RAI Numbers 13.01.01-009 and 13.01.01-010 are provided in this letter. A response to RAI Number 13.01.01-008 will be provided in a future submittal on or about December 12, 2008.

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

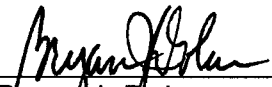
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Enclosures:


- 1) Duke Energy Response to Request for Additional Information Letter 030, RAI
13.01.01-009
- 2) Duke Energy Response to Request for Additional Information Letter 030, RAI
13.01.01-010

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. 18, 2008


Notary Public

My commission expires: Feb. 27, 2011

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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. 030

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

Reference NRC RAI Number(s): 13.01.01-009

NRC RAI:

Standard Review Plan Section 13.1.1, "Management and Technical Support Organization," section I.2.C requests the applicant describe the provisions for technical support for operations, give the approximate numbers of and describe educational and experience requirements for, each identified position or class of positions providing technical support for plant operations, and include specific educational and experience requirements for individuals holding the management and supervisory positions in organizational units providing support in the areas identified as items I.2.E – I.2.P. Section 13.1.1.2 of the application makes the statement "Table 13.1-201 shows the estimated number of positions required for each function."

Where is the information requested in SRP Sections I.2.C – I.2.P related to numbers of personnel in the application?

Where is the information requested in SRP Sections I.2.C – I.2.P related to specific educational and experience requirements for managers and supervisors in the application?

Either identify where this information is in the application, provide the information, or justify why it is not needed.

Duke Energy Response:

In addition to providing a cross reference between generic functional titles and site-specific position titles, FSAR Table 13.1-201 states the estimated number of positions that will fill that function. This number equates to the number of personnel required for each identified position. For example, SRP Section 13.1.1, Subsection I.2.E requests the numbers for each position or class of position providing the function of engineering in nuclear, mechanical, structural, electrical, thermal-hydraulic, metallurgical, materials, and instrumentation and controls disciplines. Lee Nuclear Station does not specify how many engineers will fill each discipline but provides the overall class or classes, i.e. system, design, program, reactor, which will include the various engineering disciplines as necessary. For example, Table 13.1-201 states that the expected number of system engineer positions required for one unit is 23 with an additional 4 positions required for the second unit. Similar information is provided for design engineers, program engineers, analysis engineers, and reactor engineers. The other functions specified in SRP Subsections I.2.F – I.2.P are covered in Table 13.1-201 as follows:

- Plant chemistry – chemistry manager, supervisors, and technicians
- Health physics – radiation protection manager, supervisors, and technicians

- Fueling and refueling operations support – outage manager
- Maintenance support – manager of maintenance support, manager of planning and scheduling
- Operations support – assistant operations manager of support
- Quality assurance – QA and QC manager, supervisors, auditors and inspectors
- Training – manager, supervisors, and instructors
- Safety review – nuclear safety assurance, licensing, and corrective action managers
- Fire protection – fire protection engineer
- Emergency organization – emergency preparedness manager and planners
- Outside contractual assistance – purchasing and contracts manager

Also, as discussed in FSAR Section 13.1.1.4, Lee Nuclear Station commits to meeting the education and experience requirements defined by ANSI/ANS-3.1-1993 which is endorsed by RG 1.8 with certain additions and exceptions. FSAR Table 13.1-201 provides a cross-reference to the sections of ANSI/ANS-3.1 that identify the qualification requirements for specific positions, including managers and supervisors. For positions that do not have a cross-reference section in ANSI/ANS-3.1, a change will be made to FSAR Subsection 13.1.1.4 to indicate that the most comparable ANSI/ANS-3.1 section will be used for guidance in establishing experience and education requirements.

In Table 13.1-201 the ANSI/ANS-3.1 cross-reference for some positions are not identified. Table 13.1-201 will be revised to include this information. Additionally, those positions that do not have a cross-reference section in ANSI/ANS-3.1 will be identified by inserting 'n/a' in the cross-reference column. These changes will be included in a future revision to the Lee COL application.

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

FSAR Subsection 13.1.1.4

FSAR Table 13.1-201

Attachments:

- 1) Revision to FSAR Subsection 13.1.1.4 (This identical change was proposed in the response to RAI 13.01.01-004)
- 2) Revision to FSAR Table 13.1-201

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

Attachment 1 to RAI 13.01.01-009

Revision to FSAR Subsection 13.1.1.4

Duke Letter Dated: November 18, 2008

Note: This revision was also provided as Attachment No. 2 to the response to RAI 13.01.01-004 previously submitted to the NRC on November 7, 2008.

FSAR Chapter 13, Subsection 13.1.1.4 will be revised as follows:

13.1.1.4 Qualifications of Technical Support Personnel

The qualifications of managers and supervisors of the technical support 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. For positions that do not have a cross-reference section in ANSI/ANS-3.1 the most comparable section of ANSI/ANS-3.1 is used for guidance in establishing experience and education requirements. The qualification and experience requirements of headquarters staff is established in corporate policy and procedure manuals.

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

Attachment 2 to RAI 13.01.01-009

Revision to FSAR Table 13.1-201

TABLE 13.1-201 (SHEET 1 of 5)
GENERIC POSITION / SITE SPECIFIC POSITION CROSS REFERENCE

| Nuclear Function | Function Position – ANSI/ANS-3.1-1993 section reference | | Nuclear Plant Position (Site-Specific) | Expected Positions 1st unit | Expected additional positions 2nd unit | |
|----------------------|---|--------------|---|-----------------------------------|---|--|
| Executive management | chief executive officer | <u>n/a</u> | President and Chief Executive Officer , Duke Energy | 1 | - | |
| | chief nuclear officer | <u>n/a</u> | Group Executive, Nuclear Generation and Chief Nuclear Officer | 1 | - | |
| | executive, nuclear operations | <u>n/a</u> | Senior Vice President, Nuclear Operations | 1 | - | |
| Nuclear support | executive, nuclear support | <u>n/a</u> | Senior Vice President, Nuclear Support | 1 | - | |
| | executive, plant support | <u>n/a</u> | Senior Vice President, Plant Support | 1 | - | |
| | manager, | <u>4.2.4</u> | Manager, Nuclear Technical Services | | - | |
| Plant management | executive | <u>n/a</u> | Site Vice President | 1 | - | |
| | plant manager | <u>4.2.1</u> | Nuclear Station Manager | 1 | - | |
| Engineering | executive | <u>n/a</u> | Vice President, Nuclear Engineering | 1 | - | |
| | executive | <u>n/a</u> | Vice President, Major Projects | 1 | - | |
| | manager | <u>4.2.4</u> | Manager Engineering | 1 | - | |
| | manager | <u>4.2.4</u> | Manager, Nuclear Technical Services | 1 | - | |
| | system engineering | | | | | |
| | functional manager | <u>4.3.9</u> | Manager, System Engineering | 1 | - | |
| | system engineer | <u>4.6.1</u> | System Engineer | 16 | 4 | |
| design engineering | functional manager | <u>4.3.9</u> | Manager, Design Engineering | 1 | - | |

TABLE 13.1-201 (SHEET 2 of 5)
GENERIC POSITION / SITE SPECIFIC POSITION CROSS REFERENCE

| Nuclear Function | Function Position – ANSI/ANS-3.1-1993 section reference | | Nuclear Plant Position (Site-Specific) | Expected Positions 1st unit | Expected additional positions 2nd unit |
|------------------------------------|---|-------------------------------------|---|-----------------------------------|---|
| | design engineer | <u>4.6 – staff engineer</u> | Design Engineer | 23 | 7 |
| safety and engineering analysis | functional manager | 4.3.9 | Manager, Safety and Engineering Analysis | 1 | - |
| | programs engineer | <u>4.6 – staff engineer</u> | Analysis Engineer | 4 | - |
| engineering programs | functional manager | 4.3.9 | Manager, Engineering Programs | 1 | - |
| | programs engineer | <u>4.6 – staff engineer</u> | Programs Engineer | 20 | 5 |
| reactor engineering | functional manager | 4.3.9 | Manager, Reactor Engineering | 1 | - |
| | reactor engineer | <u>4.6 – staff engineer</u> | Reactor Engineer | 3 | 1 |
| Maintenance | manager | 4.2.3 | Manager, Maintenance | 1 | - |
| instrumentation and control | functional manager | 4.3.4 | Manager, Instrumentation and Control | 1 | - |
| | supervisor | 4.4.7 | Supervisor, Instrumentation and Control | 7 | - |
| | technician | 4.5.3.3 | Instrumentation and Control Technician | 30 | 17 |
| mechanical | functional manager | 4.3.6 | Manager, Mechanical | 1 | - |

TABLE 13.1-201 (SHEET 3 of 5)
GENERIC POSITION / SITE SPECIFIC POSITION CROSS REFERENCE

| Nuclear Function | Function Position – ANSI/ANS-3.1-1993 section reference | | Nuclear Plant Position (Site-Specific) | Expected Positions 1st unit | Expected additional positions 2nd unit |
|------------------------|---|---------|---|-----------------------------------|---|
| electrical | supervisor | 4.4.9 | Supervisor, Mechanical | 9 | - |
| | technician | 4.5.7.2 | Mechanic | 30 | 14 |
| | functional manager | 4.3.5 | Manager, Electrical | 1 | - |
| | supervisor | 4.4.8 | Supervisor, Electrical | 6 | 4 |
| | technician | 4.5.7.1 | Electrician | 18 | 3 |
| support | functional manager | 4.3 | Manager, Maintenance Support | 1 | - |
| Operations | manager | 4.2.2 | Manager, Operations | 1 | - |
| operations, plant | functional manager | 4.3.8 | Assistant Operations Manager | 1 | - |
| operations, admin | functional manager | 4.3.8 | Assistant Operations Manager Support | 1 | - |
| operations, (on-shift) | functional manager | 4.4.1 | Shift Manager | 5 | 5 |
| | supervisor | 4.4.2 | Shift Supervisor | 5 | 5 |
| | licensed operator | 4.5.1 | Control Room Operator | 10 | 10 |
| | non-licensed operator | 4.5.2 | Plant Equipment Operator | 30 | 30 |
| | shift technical advisor | 4.6.2 | Shift Technical Advisor | 5 | 5 |
| Fire protection | supervisor | 4.4 | Fire Protection Engineer | 1 | - |
| Radiation protection | functional manager | 4.3.3 | Manager, Radiation Protection | 1 | - |
| | supervisor | 4.4.6 | Radiation Protection Supervisor | 3 | - |
| | technician | 4.5.3.2 | Radiation Protection Technician | 20 | 10 |

Table 13.1-201 (SHEET 4 of 5)
GENERIC POSITION / SITE SPECIFIC POSITION CROSS REFERENCE

| Nuclear Function | Function Position – ANSI/ANS-3.1-1993 section reference | | Nuclear Plant Position (Site-Specific) | Expected Positions 1st unit | Expected additional positions 2nd unit |
|--------------------------|---|--------------|--|-----------------------------------|---|
| Chemistry | ALARA specialist | <u>n/a</u> | ALARA Specialist | 2 | - |
| | functional manager | 4.3.2 | Manager Chemistry | 1 | - |
| | supervisor | 4.4.5 | Chemistry Supervisor | 3 | - |
| | technician | 4.5.3.1 | Chemistry Technician | 20 | 10 |
| rad waste | supervisor | 4.4 | Rad Waste Supervisor | 1 | - |
| | rad waste operator | <u>4.5.2</u> | Rad Waste Operator | 5 | 4 |
| Nuclear safety assurance | manager | 4.2 | Manager, Nuclear Safety Assurance | 1 | - |
| licensing | functional manager | 4.3 | Manager, Plant Licensing and Regulatory Compliance | 1 | - |
| | licensing engineer | <u>n/a</u> | Licensing Engineer | 5 | - |
| corrective action | functional manager | 4.3 | Manager, Corrective Action and Performance Improvement | 1 | - |
| | corrective action engineer | <u>n/a</u> | corrective action engineer | 2 | - |
| emergency preparedness | functional manager | 4.3 | Manager, Emergency Preparedness | 1 | - |
| | EP planner | <u>n/a</u> | EP Planner | 2 | - |
| Training | functional manager | 4.3.1 | Manager, Training and Development | 1 | - |
| | supervisor ops trng | 4.4.4 | Training Supervisor, Operations | 1 | - |
| | ops training instructor | | Ops Training Instructor | 6 | 6 |
| | supervisor tech staff/maint trng | <u>4.5.4</u> | Supervisor Tech Staff/Maint Trng | 1 | - |

Table 13.1-201 (SHEET 5 of 5)
GENERIC POSITION / SITE SPECIFIC POSITION CROSS REFERENCE

| Nuclear Function | Function Position – ANSI/ANS-3.1-1993 section reference | | Nuclear Plant Position (Site-Specific) | Expected Positions 1st unit | Expected additional positions 2nd unit |
|---------------------------|---|--------------|---|-----------------------------------|---|
| | tech staff/maint instructors | <u>4.4.4</u> | Tech Staff/Maint Instructor | 8 | - |
| Purchasing, and contracts | functional manager | 4.3 | Manager, Purchasing and Contracts | 1 | - |
| Security | functional manager | 4.3 | Manager, Security | 1 | - |
| Planning and scheduling | functional manager | 4.3 | Manager, Planning and Scheduling | 1 | - |
| | functional manager | 4.3 | Manager, Outages | 1 | - |
| Quality assurance | functional manager | 4.3.7 | Manager, Quality Assurance | 1 | - |
| | supervisor | 4.4.13 | Quality Assurance Supervisor | 1 | - |
| | QA auditor | <u>4.5.6</u> | QA Auditor | 6 | - |
| | supervisor | 4.4.13 | Quality Control Supervisor | 1 | - |
| | QC inspector | <u>4.5.5</u> | QC Inspector | 4 | 2 |
| Startup testing | supervisor | 4.4.11 | Startup Testing Supervisor | 1 | - |
| | startup test engineer | <u>4.4.1</u> | Startup Test Engineer | 6 | - |
| | supervisor | 4.4.12 | Preop Testing Supervisor | 1 | - |
| | preop test engineer | <u>4.4.1</u> | Preop Test Engineer | 20 | - |

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

RAI Letter No. 030

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

Reference NRC RAI Number(s): 13.01.01-010

NRC RAI:

Section 13.1.1.2.1, "Engineering," of the application makes the statement "Engineering work may be contracted to and performed by outside companies in accordance with the quality assurance (QA) program." Which QA program does this statement refer to?

Duke Energy Response:

FSAR 17.1, 17.5 and the response to RAI 13.01.01-001 submitted to NRC on November 7, 2008, describes the relationship between Duke and its contractors from a Quality Assurance Program. In addition, these documents also describe the transition from the Duke Energy Quality Assurance Program to the QAPD upon its approval by the Nuclear Regulatory Commission.

Associated Revision to the Lee Nuclear Station Final Safety Analysis:

None

Attachments:

None