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December 22, 2008

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

ATTENTION: Document Control Desk

SUBJECT: Duke Energy Carolinas, LLC (Duke)
Oconee Nuclear Station Units 1, 2, & 3
Docket Nos. 50-269, 50-270, 50-287
NRC Generic Letter (GL) 2004-02
Revised Request for Schedule Relief

On December 19, 2007, Oconee Nuclear Station (ONS) committed to replace seal flush orifices and cyclone separators on the Building Spray (BS), Low Pressure Injection (LPI), and High Pressure Injection (HPI) pumps for all three ONS units. The Unit 1 work was committed to be completed by January 31, 2009, Unit 2 by the fall 2008 refueling outage, and Unit 3 by the spring 2009 refueling outage.

ONS has completed this work for Unit 2. Experience with that work revealed that it will take longer than expected, and longer than the 72-hour allowed outage time (AOT) for an HPI pump when the unit is at full power. In addition, new information gained from GL 2008-01 evaluations indicates that HPI pumps are less tolerant of gas than previously understood. Consequently, this work will require installation of new vents to support HPI system restoration following online pump work. In view of this, ONS is requesting relief from our commitment to perform this work online.

Enclosure 1 to this letter contains a revision to the table of commitments provided by letter of December 19, 2007. The enclosed table reflects the revised Unit 1 HPI commitments discussed above and in a conference call with the NRC on December 11, 2008. Only Unit 1 HPI commitments are affected. The Unit 2 work is complete, the Unit 3 work is currently committed for spring 2009 outage completion, and the Unit 1 BS and LPI pump work will be completed online as previously committed.

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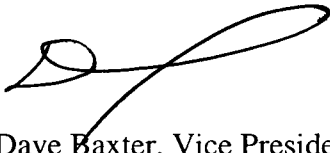
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If you have questions regarding this supplement or require any additional supporting information, please contact Russ Oakley at 864-885-3829.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 22, 2008.

Very truly yours,

A handwritten signature in black ink, appearing to read "Dave Baxter". The signature is stylized with a large loop at the end.

Dave Baxter, Vice President
Oconee Nuclear Site
Enclosure

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xc:

Mr. Luis Reyes
Region II Administrator
U.S. Nuclear Regulatory Commission
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Mr. John Stang
Project Manager (ONS)
U.S. Nuclear Regulatory Commission
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Andy Hutto
NRC Senior Resident Inspector
Oconee Nuclear Station

Enclosure 1

ONS Revised Commitments

Commitment No.	Description	Date
1	Replace seal flush orifices and cyclone separators on the Unit 1 LPI and BS Pumps	January 31, 2009
2	Replace seal flush orifices and cyclone separators on the Unit 2 LPI, HPI, and BS Pumps	fall 2008 RFO (COMPLETE)
3	Replace seal flush orifices and cyclone separators on the Unit 3 LPI, HPI, and BS Pumps.	spring 2009 RFO
4	Replace the 3A HPI Pump to utilize more durable materials for wear susceptible parts.	spring 2009 RFO OR first Unit 3 forced outage of sufficient duration
5	Review procedural guidance for operator recognition of and response to LPI, HPI, or BS seal failures or HPI pump 3A wear-related failure. Provide additional procedural guidance if needed.	February 29, 2008 (COMPLETE)
6	Replace seal flush orifices and cyclone separators on the Unit 1 HPI Pumps	fall 2009 RFO OR first Unit 1 forced outage of sufficient duration