



DAVE BAXTER  
Vice President  
Oconee Nuclear Station

Duke Energy  
ON01VP / 7800 Rochester Highway  
Seneca, SC 29672

864-873-4460  
864-873-4208 fax  
dabaxter@dukeenergy.com

August 10, 2009

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Subject: Duke Energy Carolinas, LLC  
Oconee Nuclear Station, Units 1, 2, and 3  
Docket Numbers 50-269, 50-270, and 50-287  
Supplemental Request for Additional Information for License Amendment Request  
for Reactor Protective System/Engineered Safeguards Protective System Digital  
Upgrade, Technical Specification Change Number 2007-09, Supplement 18

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 responded to an August 20, 2008, NRC request for additional information (RAI) by letter dated September 30, 2008. Duke responded to a March 9, 2009, supplemental RAI by letter dated April 3, 2009.

On June 24, 2009, Duke advised the NRC of the need to revise responses to RAI EICB 106 and RAI 80. This revision is provided in Enclosure 1. NRC also requested Duke to docket additional information associated with NRC Oconee Safety Evaluation Report (SER) Open Items (OI) 91 and 93 related to the TELEPERM XS (TXS) Test Machine and the TXS Maintenance Laptop Computer. This information is provided in Enclosure 1.

Enclosure 2 provides documents requested by the NRC Staff to resolve NRC Oconee SER OIs or to provide a docketed reference for information to be described in the SER.

Enclosure 1 contains a description of design features that secure the RPS/ESPS from electronic vulnerabilities. As such, Duke considers the information in the enclosure to be security-related information and requests that it be withheld from public disclosure pursuant to 10 CFR 2.390. Information contained in Enclosure 2 is classified by AREVA NP as proprietary. The appropriate affidavits from AREVA NP are provided in Enclosure 3 in accordance with the provisions of 10 CFR 2.390.

If there are any questions regarding this submittal, please contact Boyd Shingleton at (864) 873-4716.

Enclosure 1 contains Security-Related information. Enclosure 2 to this letter contains  
Proprietary information. Withhold from public disclosure under 10 CFR 2.390.  
Upon removal of these Enclosures this letter is uncontrolled.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on August 10, 2009.

Sincerely,

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

Dave Baxter, Vice President  
Oconee Nuclear Station

Enclosures:

1. Additional Information – Security-Related
2. AREVA NP Documents – Proprietary
3. AREVA NP Affidavit

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cc: Mr. J. F. Stang, Project Manager  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O-14 H25  
Washington, D. C. 20555

Mr. 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. E. T. Riggs  
Senior Resident Inspector (Acting)  
Oconee Nuclear Station

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

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**Enclosure 3**

**AREVA NP Proprietary Affidavits**



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.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c) and 6(d) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

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

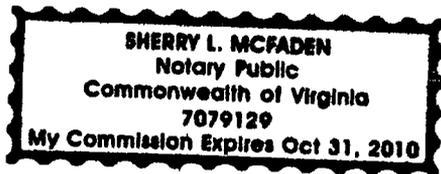
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Mark J Burzynski

SUBSCRIBED before me on this 24<sup>th</sup>  
day of July, 2009.

Sherry L. McFaden

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/10  
Reg. # 7079129





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