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March 1, 2010

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
Support for NRC Review of AREVA Topical Report ANP-10303P

Reference 1: NRC:09:063, AREVA NP letter to NRC dated June 11, 2009, "Request for Review and Approval of ANP-10303P, "SIVAT: TELEPERM XS™ Simulation Validation Test Tool Topical Report."

Reference 2: NRC Letter to Duke dated January 28, 2010, "Oconee Nuclear Station, Units 1, 2, and 3, Issuance of Amendments Regarding Acceptance of the Reactor Protective System and Engineered Safeguard Protective System (RPS/ESPS) Digital Upgrade."

Duke Energy Carolinas, LLC (Duke) recently received approval (Reference 2) to install a TELEPERM XS (TXS) digital computer based RPS and ESPS to replace the existing analog RPS/ESPS at Oconee Nuclear Station (ONS). The first implementation of this modification will be performed on Unit 1 in the Spring 2011 refueling outage.

AREVA NP used SIVAT as a design tool during development of the application software for the Oconee RPS/ESPS. The tool was not used for Verification and Validation (V&V) on the Oconee project since it was not an NRC approved validation tool. The V&V methodology approved for the Oconee RPS/ESPS digital upgrade relies on validation testing performed in the test field at the factory acceptance test stage. After the TXS system is installed in the plant, there will be limited capability to perform V&V in the Factory Acceptance Testing (FAT) or Site Acceptance Testing (SAT) test environment.

Duke would like to have SIVAT available to facilitate the V&V of software changes that may emerge after installation. After TXS is implemented on all Oconee units, performing V&V on subsequent software changes (e.g., addition of a measurement function) will become more difficult without the use of SIVAT.

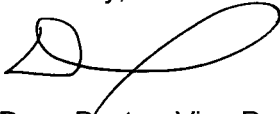
Therefore, Duke requests that NRC prioritize their review of the SIVAT Topical Report (Reference 1) considering Duke future needs.

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

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'D' followed by a long, sweeping horizontal line that curves upwards at the end.

Dave Baxter, Vice President
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