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June 10, 2010

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

Subject: Duke Energy Carolinas, LLC (Duke Energy)
Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, 50-270, 50-287
McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369, 50-370
Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413, 50-414
Oconee Nuclear Station Independent Spent Fuel Storage Installation,
Docket No. 72-004
Response to Request for Additional Information (RAI) for QA Program Topical
Report Duke-1-A, Revision 37

Reference: Letter from Duke Energy to NRC dated February 11, 2010, QA Program
Amendment Number 37

Pursuant to 10CFR50.54(a)(3) and 10CFR50.71(e), Amendment 37 to the Duke Energy Carolinas Topical Report, Duke-1-A, Quality Assurance Program was submitted to the NRC on February 11, 2010. On May 13, 2010, the NRC electronically transmitted four RAIs. The purpose of this letter is to formally respond to these RAIs. Attachment 1 contains the RAI responses in the following format: restatement of the RAI question followed by the Duke Energy response.

Based on the attached responses to the RAIs, Duke Energy is including the following new commitments:

The text of the organization description in section 17.3.1.2.2.b) will be corrected to move the Employee Concerns description to be under the Senior Vice President of Nuclear Operations (Oconee) as shown on Figure 17-2, not the Senior Vice President of Nuclear Operations (Catawba and McGuire).

Text of section 17.3.1.2.7.1, Supply Chain, will be clarified to show Nuclear Supply Chain is a division of Supply Chain.

These changes will be incorporated in the next Amendment of the QATR, which is currently scheduled for the third quarter of 2010.

NM5501
Q004
NRA

Please direct your questions on this matter to James R. Cassidy at (704) 382-4864.

I certify that all statements and matters set forth herein are true and accurate to the best of my knowledge and that the information represents changes made to the Duke Energy Carolinas Quality Assurance Program Topical Report, Duke-1-A, since the previous submittal.

Sincerely,



Mike Glover

Attachment

xc:

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**Request for Additional Information for Duke Energy Carolinas QA Program
Topical Report Duke-1-A, Revision 37**

SECTION 17.3.1 – MANAGEMENT

17.3.1.01 SRP Section 17.3, paragraph A.2.a., states in part that: "The QAPD is to contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the QA program." Duke-1-A QATR paragraph 17.3.1.2.2 (b) states that: "Nuclear Operations (Oconee) is organized into two General Office subgroups, consisting of Major Projects and Centers of Excellence. Nuclear Operations (Oconee) also provides management oversight to the Oconee nuclear site." Figure 17-2, "Corporate and Offsite Organization," shows that the that Nuclear Operations (Oconee) is organized into three General Office subgroups, consisting of Major Projects, Centers of Excellence, and Employee Concerns. Provide clarification to what division of Nuclear Generation Office the Employee Concerns subgroup reports.

Response: The Employee Concerns subgroup reports to the Senior Vice President Nuclear Operations (Oconee) as shown on Figure 17-2, "Corporate and Offsite Organization." DUKE-1-A section 17.3.1.2.2 b) correctly identifies the Employee Concerns function; however, the description was inadvertently included under Nuclear Operations (Catawba and McGuire).

Therefore, the text of the organization description in section 17.3.1.2.2.b) will be corrected to show that Employee Concerns reports to the Senior Vice President of Nuclear Operations (Oconee) as shown on Figure 17-2, not the Senior Vice President of Nuclear Operations (Catawba and McGuire).

17.3.1.02 SRP Section 17.3, paragraph A.2.a., states in part that: "The QAPD is to contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the QA program." The terms "Supply Chain" and "Nuclear Supply Chain" are utilized in the "Listing and Discussions of Amendment 37 Contents." In the proposed revision of Duke-1-A QATR the term "Nuclear Supply Chain" was utilized. In addition, Figure 17-2, "Corporate and Offsite Organization," show the use of only one term, "Supply Chain." Provide clarification if there is any distinction between the terms "Supply Chain" and "Nuclear Supply Chain".

Response: As shown on Figure 17-2, the Senior Vice-President and Chief Procurement Officer is responsible for the Supply Chain, which supports the nuclear site by providing procurement services, storage, inventory control, and receipt inspection/testing. In Amendment 36, "Nuclear Supply Chain" and "Supply Chain" referred to two distinct organizations. With the changes made to the organization as described in Amendment 37, the "Nuclear Supply Chain" was moved without changing the function to the "Supply Chain" under the responsibility of the Chief Procurement Officer, who reports to the Chief Nuclear Officer (CNO) as shown on Figure 17-2. The term "Supply Chain" is used in Section 17.3.1.2.7 and Figure 17-2. "Nuclear

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Supply Chain" is a division of "Supply Chain" providing the services detailed throughout Section 17.3.2 by the use of the term "Nuclear Supply Chain."

To address this, section 17.3.1.2.7.1, Supply Chain, will be clarified to show Nuclear Supply Chain is a division of Supply Chain.

- 17.3.1.03** SRP Section 17.3, paragraph A.2.a., states in part that: "The QAPD is to contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the QA program." The function of the Manager of Fleet Outage Support described in the "Listing and Discussions of Amendment 37 Contents" does not appear in the proposed revision of Duke-1-A QATR. Provide a description of the functions of the Manager of Fleet Outage Support.

Response: The Fleet Work Management Group which is responsible for Fleet Outage Support does not provide QA Program related functions and therefore is not described in Amendment 37. The function was included in Amendment 36 and therefore was addressed in the discussion in the "Listing and Discussions of Amendment 37 Contents." Fleet Outage Support provides governance, oversight, and support of the nuclear sites as it relates to the management of outage management/scheduling.

No changes to the QATR are identified for this RAI.

Section 17.3.3 – SELF ASSESSMENT

- 17.3.3.01** SRP Section 17.3, paragraph A.2.a., states in part that: "The QAPD is to contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the QA program." The functions of the INOS Management described in the "Listing and Discussions of Amendment 37 Contents" does not appear to be adequately described in the proposed revision of Duke-1-A QATR. It is unclear what INOS Management functions are provided in the Duke-1-A QATR to provide oversight of audits and inspections. Provide a description of the functions of the INOS Management.

Response: The organizational change in Amendment 37 altered the reporting relationship for, but did not change the responsibilities of, INOS Management. The brief description provided in submittal Attachment 1, "Listing and Discussions of Amendment 37 Contents," was included for context in discussion of the change in reporting relationship for the Manager, INOS.

The Manager, Independent Nuclear Oversight (INOS) is responsible for QA program audits, performance assessment, procurement quality, supplier verification, and QA, QC, NDE, and in-service inspection (ISI). The Manager, INOS has the authority and organizational freedom to: Identify quality problems,

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initiate, recommend or provide solutions to quality problems through designated channels, verify the implementation of solutions to quality problems, and ensure cost and schedule do not influence decision making involving quality. The Manager, INOS has unfettered access to the Chief Nuclear Officer to communicate QA program concerns and issues. This is identified in QATR Section 17.3.1.2.2.b) Nuclear General Office and depicted on Figure 17-2 by the items listed under the Manager, Independent Nuclear Oversight.

Section 17.3.3.2.3, Independent Nuclear Oversight, provides additional detail on the INOS organization identifying the section managers for INOS-Audit, INOS-Procurement Quality, INOS-Performance, whose responsibilities are described in sections 17.3.3.2.3.1, 17.3.3.2.3.2, and 17.3.3.2.3.3. Also reporting to the INOS Manager is a manager with responsibilities for INOS-Inspection, which are described in Section 17.3.2.12.

No changes are identified for this RAI.

Summary of Commitments:

The text of the organization description in section 17.3.1.2.2.b) will be corrected to move the Employee Concerns description to be under the Senior Vice President of Nuclear Operations (Oconee) as shown on Figure 17-2, not the Senior Vice President of Nuclear Operations (Catawba and McGuire).

Text of section 17.3.1.2.7.1, Supply Chain, will be clarified to show Nuclear Supply Chain is a division of Supply Chain.

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