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February 15, 2011

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

Subject: Duke Energy Carolinas, LLC

Oconee Nuclear Station, Units 1, 2, and 3 Docket Numbers 50-269, 50-270, and 50-287,

Renewed Operating Licenses DPR-38, DPR-47, and DPR-55

"License Amendment Request to Incorporate Use of Fiber-Reinforced Polymer System to Strengthen Existing Auxiliary Building Masonry Brick Walls for Tornado Loadings - Response to Request for Additional Information."

References:

- 1. Letter from Dave Baxter, Site Vice President, Oconee Nuclear Station, Duke Energy Carolinas, LLC, to the U. S. Nuclear Regulatory Commission, "License Amendment Request to Incorporate Use of Fiber-Reinforced Polymer System to Strengthen Existing Auxiliary Building Masonry Brick Walls for Tornado Loadings" - License Amendment Request No. 2009-05" dated June 29, 2009.
- 2. Letter from Dave Baxter, Site Vice President, Oconee Nuclear Station, Duke Energy Carolinas, LLC, to the U.S. Nuclear Regulatory Commission, "Tornado Mitigation License Amendment Request - Response to Request for Additional Information," dated June 24, 2010.

On June 29, 2009, Duke Energy Carolinas, LLC (Duke Energy) submitted a License Amendment Request (LAR) to incorporate the use of a Fiber Reinforced Polymer (FRP) system to strengthen existing masonry brick walls for uniform pressure loads resulting from a tornado event. The masonry walls to be strengthened are located within the Units 1, 2, and 3 Auxiliary Buildings (ABs).

Duke Energy has received and responded to several tornado-related NRC Request for Additional Information (RAI) inquiries with the latest response dated June 24, 2010 [Ref. 2]. Following receipt of this RAI response, two (2) conference calls were conducted in which the Staff discussed the responses and asked additional follow-up questions. In addition, the Staff proposed several changes to which Duke Energy has agreed. The attachment to this letter contains this information and supplements the previous RAI responses.

If you have any questions in regard to this letter, please contact Stephen C. Newman, Regulatory Compliance Lead Engineer, Oconee Nuclear Station, at (864) 873-4388.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on February 15, 2011.

Sincerely,

T. Preston Gillespie, Jr., Site Vice President, Oconee Nuclear Station

Attachment

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cc: (w/attachment)

Mr. J. F. Stang, Project Manager Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Mail Stop 8 G9A Washington, D. C. 20555

Mr. Victor McCree, Regional Administrator U. S. Nuclear Regulatory Commission - Region II Marquis One Tower 245 Peachtree Center Ave., NE, Suite 1200 Atlanta, GA 30303-1257

Mr. Andy Sabisch NRC Senior Resident Inspector Oconee Nuclear Station

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

Attachment FRP RAI Supplemental Information

The following items supplement Duke Energy's previous Fiber Reinforced Polymer (FRP) Request for Additional Information (RAI) responses dated June 24, 2010:

- 1. Duke Energy agrees to incorporate the FRP testing and inspection program into Oconee's Aging Management Program.
- 2. Duke Energy agrees to change the FRP inspection frequency to once every refueling outage, not to exceed 30 months (i.e., 24 month nominal refueling cycle + 25% grace period). In the future, this inspection frequency may be reduced to a nominal 6-year interval with appropriate justification based on the structure, environment, and previous in-service inspection results. As originally communicated in License Amendment Request No. 2009-05, dated June 29, 2009, the visual inspections will be performed on both selected portions of the FRP-strengthened masonry walls (i.e., the masonry walls required to be designed for tornado-induced loadings) and the test walls. For each inspection interval, the portions of FRP-strengthened masonry walls to be inspected will be chosen in accordance with a sampling plan developed from guidance provided by a) EPRI NP-7218 document "Guidelines for the Utilization of Sampling Plans for Commercial Grade Item Acceptance "(NCIG-19), as implemented at ONS by Supply Chain Directive SCD290, and b) Draft Regulatory Guide DG-1070, "Sampling Plans Used for Dedicating Simple Metallic Commercial Grade Items for use in Nuclear Power Plants."
- 3. The application of the FRP product will not adversely affect the prior IEB 80-11 results previously communicated to the NRC Staff. In addition, Duke Energy will document this conclusion in the appropriate site calculation(s).