Duke Energy®
Carolinas

JAMES R. MORRIS, VICE PRESIDENT

Duke Energy Carolinas, LLC
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February 24, 2011

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

Subject: Duke Energy Carolinas, LLC (Duke Energy)
Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
Generic Letter 2008-01 Commitment Change

Reference: Duke Energy Generic Letter (GL) 2008-01, 9 month response, dated October 13, 2008

In Duke Energy's response to GL 2008-01, the methods for identifying and quantifying gas voids in ECCS and Containment Spray (NS) piping for Catawba were summarized. The method identified for use in NS piping downstream of the NS heat exchangers was venting (see attached). Gas could accumulate in these areas after performance testing of the NS System pumps. Catawba will also utilize Ultrasonic Testing (UT) as an alternative to venting in these locations. UT provides an equally acceptable method for identifying and quantifying accumulated gas voids. Catawba is currently using UT in other piping areas described in our GL 2008-01 response.

This letter commits Catawba to the use of UT as an alternative to venting for the piping described above.

If any questions arise or additional information is needed, please contact P. W. Barrett at (803) 701-4138.

Very truly yours,

James R. Morris

Attachment

A134
NRR

xc (with attachment)

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U.S. Nuclear Regulatory Commission – Region II
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245 Peachtree Center Ave., NE Suite 1200
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G.A. Hutto, III
Senior Resident Inspector (CNS)
U.S. Regulatory Commission
Catawba Nuclear Station

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NRC Project Manager (CNS)
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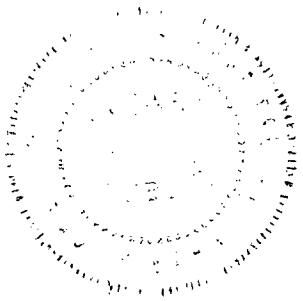
James R. Morris affirms that he is the person who subscribed his name to the foregoing Statement, and that all the matters and facts set forth herein are true and correct to the best of his knowledge.

James R. Morris, Vice President

Subscribed and sworn to me: 2-24-2011
Date

Notary Public

My commission expires: 7-10-2012
Date



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CNS GL 2008-01 10/13/08
9 MONTH RESPONSE

Summary of Committed Corrective Actions

Corrective Action 1: Monitor the status of the TSTF effort to provide revisions to NUREG-1431 Technical Specifications and their associated Bases in regard to the periodic venting surveillance. Catawba will evaluate the resolution of TS issues with respect to the changes contained in the TSTF traveler, and submit a license amendment request based on this evaluation within 180 days following NRC approval of the TSTF.

Status: Waiting on TSTF approval process.

Schedule: To be determined by TSTF approval process.

Basis: The completed and proposed procedure revisions will maintain the ECCS and Containment Spray systems operable in the interim.

Corrective Action 2: Revise the UFSAR in regard to gas accumulation and venting consistent with the guidance described in GL 2008-01.

Status: Incomplete.

Schedule: Approve UFSAR change packages by January 31, 2009.

Basis: Schedule allows sufficient time to complete the change packages in a timely manner following completion of the GL 2008-01 response. Completion of this corrective action is not a requirement of operability.

Corrective Action 3: The quarterly surveillance procedures that operate the Residual Heat Removal pumps in a recirculation alignment require the heat exchanger outlet valves to be closed to avoid any fluid momentum effect. Consistent with the recommendations of the Generic Letter, this practice will be discontinued to alleviate any preconditioning concerns.

Status: Complete

Corrective Action 4: Additional venting downstream of the Containment Spray heat exchanger is recommended after pump testing since gas could be transported downstream of the heat exchanger during the pump test. The procedure revision shall also include criteria to ensure entry into the Corrective Action Program (PIP) and engineering notification, if gas is found above the low threshold specified in the procedure.

Status: Complete