



RONALD A. JONES
Sr Vice President
Nuclear Development

December 12, 2011

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U.S. Nuclear Regulatory Commission
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Charlotte, NC 28201-1006

704-382-8149
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Ron.Jones@duke-energy.com

Subject: Duke Energy Carolinas, LLC (Duke Energy)
William States Lee III Nuclear Station - Docket Nos. 52-018 and 52-019
AP1000 Combined License Application for the
William States Lee III Nuclear Station Units 1 and 2
Voluntary Supplement to Summary Identification of Concurrence with
Standard Content Regarding Loss of Large Areas Due to Explosion or Fire
(LOLA) Issues
Ltr # WLG2011.12-01

- References: (1) Letter from Bryan J. Dolan (Duke Energy) to NRC Document Control Desk, *Summary Identification of Concurrence with Standard Content RAIs and Safety Evaluation Report Open Items*, dated November 4, 2010 (ML103130134)
- (2) Letter from C.R Pierce (Southern) to NRC Document Control Desk, *Response to Response to Additional Information Letter No. 52*, dated May 5, 2010 (ML101340017)
- (3) Letter from C.R Pierce (Southern) to NRC Document Control Desk, *Response to Response to Additional Information Letter No. 52, Supplement 1*, dated May 28, 2010 (ML101530059)

This letter provides supplemental information to Duke Energy's submittal identified as Reference 1 above. Reference 1 did not endorse Southern Nuclear's site specific responses to RAI Nos. 19-89 and 19-91 documented in References 2 and 3. Duke Energy's modified response to endorse these RAI responses with clarifying notes is addressed in Enclosure No. 1.

If you have any questions or need any additional information, please contact Jim Thornton, Nuclear Plant Development Licensing Manager (Acting), at (704) 382-2612.

Sincerely,

Ronald A. Jones
Senior Vice President
Nuclear Development

Enclosure:

Voluntary Supplement to Summary Identification of Concurrence with Standard Content
Regarding Loss of Large Areas Due to Explosion or Fire (LOLA) Issues

xc (w/out enclosure):

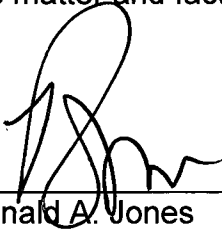
Charles Casto, Deputy Regional Administrator, Region II

xc (w/ enclosure):

Brian Hughes, Senior Project Manager, DNRL

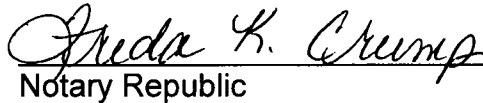
AFFIDAVIT OF RONALD A. JONES

Ronald A. Jones, being duly sworn, states that he is a Senior Vice President, Nuclear Development, Duke Energy Carolinas, LLC, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission that this combined license application for the William States Lee III Nuclear Station, and that all the matter and facts set forth wherein are true and correct to the best of his knowledge.



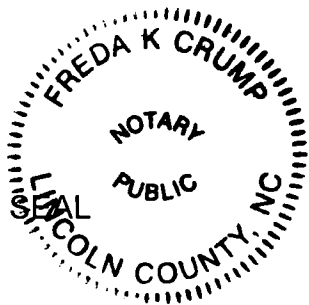
Ronald A. Jones

Subscribed and sworn to me on December 12, 2011



Notary Republic

My commission expires: August 17, 2016



Voluntary Supplement to Summary Identification of Concurrence with Standard Content Regarding Loss of Large Areas Due to Explosion or Fire (LOLA) Issues

Duke Energy proposes to revise the previous response in the November 4, 2010 letter concurring with standard content from the Reference Combined Operating License Application (R-COLA). Refer to Reference 1, Attachment 2. Two RAI responses will be updated with this revision: 1) RAI/OI # 4070 (Official NRC RAI # 19-089) and 2) RAI/OI # 4072/4144 (Official NRC RAI # 19-091 and 19-091 S1 VR).

1) RAI/OI # 4070 (Official NRC RAI # 19-089) is revised from:

RAI/OI ID#	ERAI/OI #	RAI/OI Topic/Subject	Date Submitted	RAI/OI Ltr #	Utility Specific	Official NRC RAI/OI #	S-COLA Endorsement
4070	4459	19-89: Address how engineering basis for 10 CFR 50.54(hh)(2) is to be documented and available for audit	5/5/2010	052	Southern	19-089	NA

to read:

RAI/OI ID#	ERAI/OI #	RAI/OI Topic/Subject	Date Submitted	RAI/OI Ltr #	Utility Specific	Official NRC RAI/OI #	S-COLA Endorsement
4070	4459	19-89: Address how engineering basis for 10 CFR 50.54(hh)(2) is to be documented and available for audit	5/5/2010	052	Southern	19-089	Yes.

2) RAI/OI # 4072/4144 (Official NRC RAI # 19-091 and 19-091 S1 VR) is revised from:

RAI/OI ID#	ERAI/OI #	RAI/OI Topic/Subject	Date Submitted	RAI/OI Ltr #	Utility Specific	Official NRC RAI/OI #	S-COLA Endorsement
4072	4459	19-91: Update Mitigative Strategies Table to differentiate between commitments and strategies	5/5/2010	052	Southern	19-091	NA
4144	4459	Clarifications re: Updated Mitigative Strategies Table to differentiate between commitments and strategies	5/28/2010	052 S1	Southern	19-091 S1 VR	NA

to read:

RAI/OI ID#	ERAI/OI #	RAI/OI Topic/Subject	Date Submitted	RAI/OI Ltr #	Utility Specific	Official NRC RAI/OI #	S-COLA Endorsement
4072	4459	19-91: Update Mitigative Strategies Table to differentiate between commitments and strategies	5/5/2010	052	Southern	19-091	No. Superseded by Letter 52, S1 below:
4144	4459	Clarifications re: Updated Mitigative Strategies Table to differentiate between commitments and strategies	5/28/2010	052 S1	Southern	19-091 S1 VR	Yes. See Note 4.

Under the "Notes from the New Duke Submittal" Section add Note 4:

4: Since Lee Units 1 and 2 are not co-located with operating units, as is the case for Vogtle Units 3 and 4, the discussion of current operating unit commitments in relation to the new unit commitments is not applicable to the Lee response. In addition, the requirement to list the due dates for commitments in the Mitigative Strategies Table is no longer needed since this is captured in the Lee COLA, Part 10, Proposed License Conditions (including ITAAC), Item 6(g).

References:

- (1) Letter from Bryan J. Dolan (Duke Energy) to NRC Document Control Desk, *Summary Identification of Concurrence with Standard Content RAIs and Safety Evaluation Report Open Items*, dated November 4, 2010 (ML103130134)
- (2) Letter from Dhiaa M. Jamil (Duke Energy) to NRC Document Control Desk, *Loss of Large Areas of the Plant Due to Explosions or Fire (LOLA) Mitigative Strategies Description and Plans, Revision 1*, dated February 15, 2011

Associated Revisions to the Lee Nuclear Station COLA:

None.

The February 15, 2011 submittal of the *Lee Loss of Large Areas Due to Explosions or Fire (LOLA) Mitigative Strategies Description and Plans, Revision 1* (Reference 2) included the changes to the Mitigative Strategies Tables (MST) discussed in R-COLA RAI 19-091. Reference 2, Attachment C, *Variations From Previously Docketed Changes Incorporated into the Lee LOLA Plan, Rev 1*, discussed: 1) the addition of the abbreviations for "Commitments (C)" and "Strategies (S)" in the MST and 2) the removal of scheduled completion dates for commitments in items 14, 17, 19, 20, 21, 22, 23, and 29. These changes were incorporated into Revision 1 of the Lee LOLA Plan to match the R-COLA LOLA plan submittal. Thus, no further COLA changes are required.

Attachments:

None.