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10 CFR 50.90

September 5, 2012

U.S. Nuclear Regulatory Commission
Document Control Desk
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Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station Units 1, 2, and 3
Docket Numbers 50-269, 50-270 and 50-287
NFPA 805 Performance-Based Standard for Fire Protection for Light Water
Reactor Generating Plants (2001 Edition)
Supplement 1 to LAR 2012-09, License Amendment Request for Revision to
License Condition 3.D, Transition License Conditions #1 and #2

Pursuant to 10 CFR 50.90, Duke Energy Carolinas, LLC (Duke Energy) proposes to amend Renewed Facility Operating License Nos. DPR-38, -47, and -55. This License Amendment will result in a revised completion date for the Implementation Items and Protected Service Water (PSW) Modification in License Condition 3.D, Transition License Conditions #1 and #2, respectively.

By letter dated December 29, 2010, Duke Energy received Amendments 371, 373, and 372, allowing the licensee to maintain a fire protection program in accordance with 10 CFR 50.48(c) for the Oconee Nuclear Station, Units 1, 2, and 3 (ONS), and changed the license and technical specifications accordingly. The Amendments contained a new license condition 3.D that cited Transition License Conditions #1 and #2 pertaining to implementation items in Table 2.9-1 and modifications in Table 2.8.1-1.

Transition License Conditions regarding Table 2.9-1, Implementation Items and Table 2.8.1-1, 'Committed Plant Modifications', Item 1, PSW Modification, require date revisions due to administrative and technical issues associated with completing the PSW modification. Duke Energy requested that the completion dates for these items be revised from January 1, 2013 to December 31, 2014. Specific details and justification for the implementation items and modification changes were provided in a submittal dated July 31, 2012. These changes were discussed with the NRC in a public meeting on July 19, 2012, and a conference call on July 24, 2012.

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In a follow-up conference call on August 20, 2012, the NRC requested additional information concerning the number of implementation items that will remain open beyond January 1, 2013 and the reasons for extension. Duke Energy has identified three implementation items that will remain open as a result of PSW implementation. The implementation items and reasons for extension are provided as follows:

Item #	Implementation Item Description	Reasons
23.	Complete the analysis of NPO fire impacts for fire zones following installation of the NFPA 805 committed modifications. After implementation, update Oconee Site Calculation (OSC)-9313 and its NPO recommendations for affected fire zones.	PSW is utilized to maintain certain Key Safety Functions. Since the PSW modification will not be implemented by December 31, 2012, this implementation item cannot be completed and requires extension until after full implementation of PSW.
32.	Incorporate the PSW modification into FPP site documents after the modification is implemented.	Since the PSW modification will not be implemented by December 31, 2012, this implementation item cannot be completed and requires extension until after full implementation of PSW.
43.	Confirm that the risk decrease from the as-built PSW continues to bound the cumulative VFDR transition risk once the PSW modifications are installed.	Since the PSW modification will not be implemented by December 31, 2012, the as-built configuration will be unknown; therefore, this implementation item cannot be completed and requires extension until after full implementation of PSW.

Given the risk benefit of the PSW System, Duke Energy will continue to provide timely updates to the NRC regarding progress of the PSW project.

Should you have any questions regarding this information, please call David Goforth at (864) 382-2659.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 5, 2012.

Sincerely,



T. Preston Gillespie, Vice President
Oconee Nuclear Station

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