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10 CFR 50.4

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

**Subject:** Duke Energy Carolinas, LLC (Duke Energy)

Catawba Nuclear Station (CNS), Units 1 and 2  
Docket Nos. 50-413 and 50-414  
Renewed License Nos. NPF-35 and NPF-52

McGuire Nuclear Station (MNS), Units 1 and 2  
Docket Nos. 50-369 and 50-370  
Renewed License Nos. NPF-9 and NPF-17

Oconee Nuclear Station (ONS), Units 1, 2, and 3  
Docket Nos. 50-269, 50-270, and 50-287  
Renewed License Nos. DPR-38, DPR-47, and DPR-55

Duke Energy's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

- Reference:**
1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
  2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
  3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
  4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Duke Energy. Reference 1 was immediately effective and directs Duke Energy to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms that Duke Energy has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed or in progress for this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- Site-specific evaluations are in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

Technical difficulties encountered that could affect Duke Energy's ability to provide the February 28, 2013, submittal:

- None at this time

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for CNS Unit 1 prior to startup from Refueling Outage (RFO) 22 (Fall 2015)
- Implementation of the order will be completed for CNS Unit 2 prior to startup from Refueling Outage (RFO) 20 (Spring 2015)
- Implementation of the order will be completed for MNS Unit 1 prior to startup from Refueling Outage (RFO) 23 (Fall 2014)
- Implementation of the order will be completed for MNS Unit 2 prior to startup from Refueling Outage (RFO) 23 (Fall 2015)
- Implementation of the order will be completed for ONS Unit 1 prior to startup from Refueling Outage (RFO) 29 (Fall 2016)
- Implementation of the order will be completed for ONS Unit 2 prior to startup from Refueling Outage (RFO) 27 (Fall 2015)
- Implementation of the order will be completed for ONS Unit 3 prior to startup from Refueling Outage (RFO) 28 (Spring 2016)


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This is Duke Energy's consolidated response for its licensed operating plants (CNS Units 1 and 2; MNS Units 1 and 2; and ONS Units 1, 2, and 3). This letter contains no new regulatory commitments.

Should you have any questions concerning this letter, or require additional information, please contact Jeff Thomas, Manager, Fukushima Response Program Operations and Support, at (704) 382-3438.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 29, 2012.

Respectfully submitted,

  
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