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

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station (ONS), Units 1, 2, and 3
Docket Numbers 50-269, 50-270, and 50-287,
Renewed Operating Licenses DPR-38, DPR-47, and DPR-55
Revision to Tornado Mitigation Strategy Regulatory Commitments 11T, 12T, 13T, and
16T

References:

1. Letter to the Nuclear Regulatory Commission from Henry B. Barron (Duke Energy) dated January 25, 2008, "Tornado/HELB Mitigation Strategies and Regulatory Commitments."
2. Letter to the Nuclear Regulatory Commission from T.P. Gillespie (Duke Energy) dated February 21, 2012, "Revision to Tornado/HELB Mitigation Strategies and Regulatory Commitments."

This letter documents Duke Energy Carolinas, LLC (Duke Energy) notification to the Nuclear Regulatory Commission (NRC) of a revision to the tornado mitigation strategy commitments associated with Main Steam Isolation Valves (MSIVs) originally made in Reference 1 and later revised in Reference 2. Duke Energy verbally notified the Deputy Director, Division of Operating Reactor Licensing of the NRC by telephone call on June 27, 2013, of the revision to these commitments. Notification of these commitment changes is being made in accordance with commitment 10T.

In addition to the installation of MSIVs, Oconee is committed to the implementation of the Protected Service Water (PSW) project, National Fire Protection Association (NFPA) 805, and the completion of external flood related modifications before the end of 2016. The implementation of the Protected Service Water project and NFPA 805 provides a significant risk benefit and remains a site priority for the Oconee Station. The modifications associated with external flooding have increased regulatory importance because they are associated lessons learned from the Fukushima event.

Oconee understands the need to be predictable in meeting its regulatory commitments. Oconee also recognizes the practical limitations on organizational capacity in that these projects place demands on many of the same internal and external resources. Continuing MSIV project activities in parallel with these other regulatory committed projects would adversely impact the performance of all projects as they compete for common resources. Therefore, Duke Energy believes that the deferral of the MSIV project is a prudent measure in providing increased certainty in the timely completion of other major modifications associated with regulatory commitments that have greater priority. This view is informed, in part, by lessons learned from recent delays experienced in implementing the PSW project. Duke Energy intends to place the

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MSIV project in a hold status in order to sequence the projects in a realistic and achievable manner.

As such, the commitments are changed as follows:

- The MSIV installation shall be during 1EOC31 in 2020, 2EOC30 in 2021 and 3EOC31 in 2022 for Units 1, 2 and 3 respectively. The associated commitments are 11T, 12T and 13T for Units 1, 2 and 3 respectively.
- Related commitment 16T to physically protect the Atmospheric Dump Valve's (ADV's) function per Regulatory Guide 1.76, Revision 1, which is part of the overall MSIV project, is deferred to the same schedule. Commitment 16T is changed such that Duke Energy will physically protect the Atmospheric Dump Valve's (ADV's) function per RG 1.76, Rev 1 during 1EOC31 in 2020, 2EOC30 in 2021 and 3EOC31 in 2022 for Units 1, 2 and 3 respectively.

If you have any questions in regard to this letter, please contact Terry Patterson, ONS Safety Assurance Manager, at (864) 873-3163.

Sincerely,



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