



Robert Kitchen
Licensing Manager
Nuclear Development

Duke Energy
EC09D/ 526 South Church Street
Charlotte, NC 28201-1006

Mailing Address:
P.O. Box 1006 – EC09D
Charlotte, NC 28201-1006

704-382-4046
919-219-6356 (cell)
Robert.Kitchen@duke-energy.com

October 23, 2012

Dr. Richard Darden
U.S. Army Corps of Engineers
Charleston District
69-A Hagood St.
Charleston, SC 29403-5107

Subject: Duke Energy Carolinas, LLC
William S. Lee III Nuclear Station
Ponds A and B Drawdown
Ltr# WLG2012.10-02

Dear Dr. Darden:

With reference to recent discussions associated with the temporary water level drawdown of Ponds A and B during cooling water intake/refill structure construction, enclosed is the September 19, 2012 response to the Nuclear Regulatory Commission addressing this activity. As noted in the response, Duke Energy fully anticipates that any shoreline/riparian vegetation affected during the drawdown will recover naturally via the existing seedbank.

The construction drawdown is not expected to remove all hydrology from the wetland areas and they are still expected to function as wetlands. Nevertheless, as an added precaution, in addition to the measures discussed in the enclosure, Duke Energy is willing to install temporary dikes (e.g. sandbags, straw bales, etc.) down gradient of existing shoreline wetlands as a minimization measure to provide further assurance that the current hydrology characteristics in the wetland areas are maintained. Further, Duke Energy proposes monitoring to ensure that the wetlands fully recover after construction. Prior to construction, Duke Energy proposes to conduct a baseline survey of these wetlands to qualitatively catalogue data on floristic composition and hydrology. During the construction drawdown period, Duke Energy proposes semi-annual monitoring (spring/fall) of the hydrology in these wetlands. One growing season after the ponds are refilled to their original full pond elevation, Duke Energy will conduct monitoring to catalogue the vegetation and hydrology within the recovered wetlands. If the floristic composition does not contain a prevalence of hydrophytic vegetation that includes species previously documented, Duke Energy will provide supplemental seeding or planting to ensure that the wetland areas will have wetland vegetation.

U.S. Army Corps of Engineers
October 23, 2012
Page 2 of 2

If you have questions or need additional information, please contact either Angie Grooms at (704) 382-4554 or Robert Wylie at (704) 382-4669.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Kitchen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert Kitchen
Licensing Manager
Nuclear Development

cc: Alicia Rowe – SCDHEC
Patricia Vokoun – NRC
Terry Miley - PNNL

Enclosure: Letter from Christopher Fallon (Duke Energy) to Document Control Desk (NRC) dated September 19, 2012

Enclosure

Duke Letter Dated: October 23, 2012

Lee Nuclear Station

Enclosure

**Letter from Christopher Fallon
(Duke Energy) to Document Control Desk (NRC)
Dated September 19, 2012**



CHRISTOPHER M. FALLON
Vice President
Nuclear Development

Duke Energy
EC09DV 528 South Church Street
Charlotte, NC 28201-1006

Mailing Address:
P.O. Box 1006 – EC09D
Charlotte, NC 28201-1006

704-382-9248
704-519-6173 (cell)
Christopher.Fallon@duke-energy.com

September 19, 2012

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

Subject: Duke Energy Carolinas, LLC
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
Supplemental Information Request
Ltr# WLG2012.09-01

Reference: Ponds A and B Drawdown, email from Sarah Lopas to Robert Wylie, dated August 8, 2012.

This letter provides supplemental information in response to a request received by Duke Energy Carolinas, LLC from the Nuclear Regulatory Commission (NRC) via email from Sarah Lopas to Robert Wylie on August 8, 2012. The response to the NRC information request described in the referenced correspondence is addressed in a separate enclosure.

If you have any questions or need additional information, please contact Robert Kitchen, Nuclear Development Licensing Manager, at (704) 382-4046.

Sincerely,

Christopher M. Fallon
Vice President
Nuclear Development

Enclosure:

1. Supplemental Information

U.S. Nuclear Regulatory Commission
September 19, 2012
Page 2 of 3

xc (w/out enclosure):

Frederick Brown, Deputy Regional Administrator, Region II

xc (w/ enclosure):

Sarah Lopas, Project Manager, DSER
Brian Hughes, Senior Project Manager, DNRL
Terri Miley, PNNL

AFFIDAVIT OF CHRISTOPHER M. FALLON

Christopher M. Fallon, being duly sworn, states that he is 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 this Combined License Application for the William States Lee III Nuclear Station, and that all the matter and facts set forth herein are true and correct to the best of his knowledge.

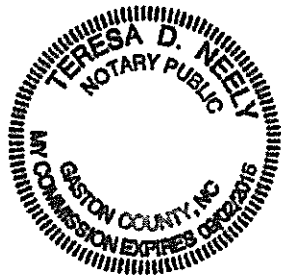
Christopher M. Fallon
Christopher M. Fallon, Vice President
Nuclear Development

Subscribed and sworn to me on 9/19/12

Teresa D. Neely
Notary Public

My commission expires: 9/2/15

SEAL



Supplemental Information Request:

Volume I, Part II William States Lee III Nuclear Station Section 404 Permit Application Package (Joint Permit Application [JPA]), pages 2-18 and 2-19 of the permit narrative discuss the need to draw down Make-Up Pond A and Make-Up Pond B to relieve pressure on the cofferdams during construction of the associated intake/refill structures. Drawings on pages 15 and 37 in Volume I, Part II.B Plan View Details and Cross Sections of the JPA depict a draw-down depth of 20 feet in both Make-Up Pond A and Make-Up Pond B.

With respect to these draw-downs, please provide:

- a) A conservative estimate of the duration of drawdown in Make-Up Pond A and Make-Up Pond B;
- b) A graphical depiction and a numerical description of the area of shoreline exposed around the margins of Make-Up Pond A and Make-Up Pond B based on bathymetry;
- c) A description of the general composition of exposed and unexposed shoreline substrate and presence/absence of any woody debris;
- d) Any plans to assess baseline conditions and monitor recovery of terrestrial and aquatic resources;
- e) Any plans for interim shoreline stabilization and erosion control (e.g., vegetation establishment); and
- f) Any contingency plans for mitigation in the event resources do not recover.

Duke Energy Response:

- a) Make-up Pond A will be drawn down 20 feet for approximately 32 months during the construction of the intake structure, refill structure, and associated cofferdams. Make-up Pond B will be drawn down 20 feet for approximately 34 months during the construction of the intake structure, intake/refill structure, and associated cofferdams.
- b) The enclosed graphic illustrates the extent of the 20-foot draw-downs associated with the construction of the intake structures, refill structures, and associated cofferdams within Make-up Ponds A and B (Attachment 1). The 20-foot draw down will temporarily reduce the size of Make-up Pond A by approximately 28 acres and the size of Make-up Pond B by 64 acres.
- c) The majority of shoreline surrounding Make-up Ponds A and B is forested, with some areas maintained as grass and other slopes stabilized with riprap. The general composition of exposed and unexposed shoreline substrate associated with Make-up Ponds A and B consists of sandy and clay loams. Being manmade impoundments within

Duke Letter Dated: September 19, 2012

steep terrain, there is little littoral habitat present within Make-up Ponds A and B. Some emergent vegetation exists within Ponds A and B, in shallow coves and fringe wetlands. Vegetative cover types surrounding Ponds A and B are diverse and include: open field/meadow, upland scrub, pine, hardwood, and mixed pine/hardwood. Considering the surrounding vegetation, it is likely trees and limbs have fallen into the impoundments since construction in the early 1980's.

- d) As noted in Environmental Report (Chapter 6), ecological monitoring will be performed in accordance with environmental permit requirements. Potential permit requirements can include a baseline vegetation survey of the shoreline and riparian area and a vegetation/habitat survey of the shoreline one growing season following the refill of Ponds A and B.
- e) Interim shoreline stabilization and erosion control will be implemented in accordance with the South Carolina Department of Health and Environmental Control (SCDHEC) erosion control procedures. These procedures can include implementation of best management practices (e.g., temporary seeding and sediment control measures) provided in SCDHEC's Stormwater Management BMP Field Manual.
- f) Any contingency plans or adaptive management concerning the recovery of resources affected by the construction draw downs of Make-up Ponds A and B will be performed in accordance with environmental permit requirements. Duke anticipates that any shoreline/riparian vegetation affected by the drawdown will recover naturally via the existing seedbank (DeBerry et.al., 2005; Landman et. al., 2007; Payne 1992). However, Duke will follow the pertinent measures (e.g., temporary seeding) outlined in the SCDHEC BMP manual if these resources have not recovered.

References:

1. Ponds A and B Drawdown, email from Sarah Lopas to Robert Wylie, dated August 8, 2012.
2. DeBerry. A.D., J.E. Perry. 2005. A Drawdown Flora in Virginia. *Castanea* 70(4): 276-286. December 2005
3. Landman, G.B., R.K. Kolka, and R.R. Sharitz. 2007 Soil Seed Bank Analysis of Planted and Naturally Revegetating Thermally-Disturbed Riparian Wetland Forest. *Wetlands* 27(2):211-223. June 2007
4. Payne, N.F. 1992. Techniques for Wildlife Habitat Management of Wetlands. Biological Resource Management Series. McGraw-Hill, Inc.

Attachment:

1. Draw-down of Make-Up Ponds A and B during construction

Enclosure 1
Duke Letter Dated: September 19, 2012

Page 3 of 5

Attachment 1

Draw-down of Make-Up Ponds A and B during construction

