

**From:** Guzman, Richard  
**Sent:** Friday, January 17, 2014 1:07 PM  
**To:** 'Shingleton, Boyd'  
**Cc:** Wasik, Christopher J  
**Subject:** RE: Minor comments on Safety Evaluation for Amendment Nos 383 385 & 384.docx

Boyd,

As we discussed, I have no objections to your comments; I agree these are minor errors, administrative in nature (see below) and do not impact the NRC staff's safety basis and reasonable assurance determination/conclusion. While I do not intend on issuing a correction letter, this email exchange will be added to ADAMS as an official agency record for staff's consideration for future reference/related applications. I do appreciate your quality read and review of the SE; thank you for your comments.

Minor comments on Safety Evaluation for Amendment Nos. 383, 385, & 384

1. *In the description of the requested TS Change (Section 3.2), the last sentence on page 4 starting with "The above note is added to avoid using up the 45 day CT concurrent..." should be below the note for TS RA C.2.2.5 on page 5 and should refer to Note 2 since these were broken into 3 notes. The Note "above" modifies RA C.2.2.3. This note modifies the 45 day CT of RA C.2.2.5.*

Your comment is noted by the NRC staff. The quoted sentence should have read, "The below ~~above~~ note is added..."

2. *In the description of the requested TS Change (Section 3.2), while there is mention of notes being added below the 45 day CT, there is no mention of the 62 day completion time that they apply to.*

Your comment is noted by the NRC staff. We agree the SE Section 3.2 would be more clear and improved with a description of how the notes are applicable to the 62-day completion time.

3. *The last 4 sentences on page 6, while true, are not relevant to the pole rewind work. Don't have to seal wicket gates to perform generator work, just need to dewater the penstock so we can install a shaft locking device.*

This technicality is noted by the NRC staff; however, it does not affect the staff's reasonable assurance determination regarding the acceptability of the proposed Technical Specification change.

4. *The first sentence on page 10 says that in letter dated December 14, 2012, the licensee stated that the generator field pole rewind work will be performed in January and July of 2014, to avoid performing the work during the peak tornado months of March, April, May, and June. ...The December 14, 2012 letter doesn't say this. In this letter (RAI 2 response), we said there was no need to avoid the peak tornado months based on the PRA assessment. We later (in phone conversations) said that by scheduling them as we had we were avoiding, for the most part, the peak tornado months.*

The comment is noted by the NRC staff w/no objections or questions. We agree it is not a completely accurate statement.

5. *Page 14, Section 3.7, first bullet: With two KHUs in allowed outage time for maintenance, in addition to LCT, other back-up power sources (a diesel generator at KHU Station, and a black-start capable Hydro Power Unit at Jocassee Station) are available and can provide power to safety system buses necessary to maintain all three ONS units in a safe shutdown condition, should a loss of all station power occur, until power can be restored. The diesel generator at the KHU station can restore the remaining operable KHU when in dual KHU outage - the KHU can get all three ONS unit in a safe shutdown condition. Note: Section 3.4, page 8, 2nd bullet characterizes the function of the backup DG at Keowee more complete so the shortened version in the conclusion section is okay.*

The comment is noted by the NRC staff w/no objections or questions. The Section 3.4, page 8, 2<sup>nd</sup> bullet is a more appropriate characterization of the function of the backup DG at Keowee.

**Rich Guzman**  
**Sr. Project Manager**  
**NRR/DORL/LPL1-1**  
**US NRC**  
**301-415-1030**

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**From:** Shingleton, Boyd [<mailto:Boyd.Shingleton@duke-energy.com>]  
**Sent:** Tuesday, January 14, 2014 8:05 AM  
**To:** Guzman, Richard  
**Cc:** Wasik, Christopher J  
**Subject:** Minor comments on Safety Evaluation for Amendment Nos 383 385 & 384.docx

Rich,

A few minor comments on the Safety Evaluation for the 62 day Keowee LAR. My opinion is they don't affect any of the conclusions and don't require any changes to the SE. I'll call you to discuss.

*Boyd Shingleton*

ONS Regulatory Affairs

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