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January 8, 2015

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

10 CFR 52.79

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 Response to Request for Additional Information (RAI No. 50) RAI
13.03-55
Ltr#: WLG2015.01-01

- Reference:
1. Letter from Brian C. Anderson (NRC) to Peter S. Hastings (Duke Energy), Request for Additional Information Letter No. 025 Related to SRP Section 13.3 for the William States Lee III Units 1 and 2 Combined License Application, dated September 26, 2008 [ML082690889]
 2. Letter from Bryan J. Dolan (Duke Energy) to Nuclear Regulatory Commission (NRC) dated December 23, 2008, Partial Response to Request for Additional Information (RAI No. 50) Ltr#: WLG2008.12-30 [ML090020175]
 3. Letter from Christopher M. Fallon (DEC) to Nuclear Regulatory Commission (NRC) dated June 12, 2012, Supplemental Response to Request for Additional Information (RAI) Letter 83, RAI Nos. 13.03-77 and 13.03-87 Ltr#: WLG2012.06-01 [ML12166A288]

This letter provides Duke Energy's supplemental response to the Nuclear Regulatory Commission's request for additional information (RAI), Letter 025 included in Reference 1 and replaces the original response provided in Reference 2 for questions 13.03-55, SITE-2 (M), (P.2), and (Q). This supplement aligns the responses to these items with a change made to the WLS Emergency Plan in a supplemental RAI response to RAI Letter 83 question 13.03-77 via Reference 3.

The supplemental response to the NRC information request described in Reference 1 is addressed in a separate enclosure.


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

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MRO

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I declare under penalty of perjury that the foregoing is true and correct. Executed on January 8, 2015.

Sincerely,

A handwritten signature in black ink that reads "Christopher M. Fallon". The signature is written in a cursive style with a prominent initial "C".

Christopher M. Fallon
Vice President
Nuclear Development

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Enclosure:

Lee Nuclear Station Units 1 and 2 Supplemental Response to Request for Additional Information (RAI No. 50) RAI 13.03-55, SITE-2 (M), (P.2), and (Q)

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xc (w/out enclosure):

Frederick Brown, Deputy Regional Administrator, Region II
Brian Hughes, Senior Project Manager, DNRL

Enclosure to WLG2015.01-01

**Lee Nuclear Station Units 1 and 2 Supplemental Response to Request for
Additional Information (RAI No. 50) RAI 13.03-55, SITE-2 (M), (P.2), and (Q)**

Lee Nuclear Station Response to Request for Additional Information (RAI)

RAI Letter No. 025

NRC Technical Review Branch: Licensing and Inspection Branch (NSIR/DPR/LIB (EP))

Reference NRC RAI Number(s): 13.03-055

NRC RAI:

SITE-2: Onsite Emergency Response Organization Assignments

Basis: 10 CFR 50, Appendix E.IV.A.2.b; NUREG-0654/FEMA-REP-1, Evaluation Criterion B.1, Evaluation Criterion B.3, Evaluation Criterion B.5, Evaluation Criterion B.7, Evaluation Criterion B.8, Evaluation Criterion B.9

SRP ACCEPTANCE CRITERIA: Requirements A and B; Acceptance Criteria 1 and 18

- M. Dose assessment capability and use in determination for radiological protective action decision-making is required per 10 CFR 50.47(b)(9), and is further described in guidance in NUREG-0654; however it is not clear that function is assigned to on-shift or early response personnel. This specific functional capability discussion does not appear to be consistently described in the Lee Emergency Plan, (for example, pages II-10 and II-19). On-shift capability for dose assessment in the determination of emergency classification, on-site protective action, and offsite protective action recommendations does not appear to be specifically addressed. Provide additional information on the specific emergency responder assignments for dose assessment on-shift, and how on-shift and augmented staff functional assignments for this activity meet or exceed NUREG-0654 augmentation guidance, as you commit on page II-12.
- P. Table II-2, "Plant Staff Emergency Functions," describes the proposed staff augmentation capabilities for listed emergency functions.
- P.2. Describe how a 75 minute timeliness to fulfill the dose assessment function is in accordance with regulations and meets or exceeds NUREG-0654 guidance.
- Q. Appendix 2, "Radiological Monitoring and Assessment," to the Lee Emergency Plan does not describe the emergency response facilities (including the control room) where the capability to perform dose assessment resides. Provide additional information on where this capability exists and align other references in the emergency plan, in tables such as Tables II-1 and II-2).

Duke Energy Response:

- M. A change made to Table II-2 of the WLS Emergency Plan that was committed to by Duke Energy in a letter dated June 12, 2012 [ML12166A288] and incorporated in the Plan in WLS COLA Submittal 6, states that there will be an individual on-shift with the qualification to perform off-site dose projections until relieved by staff augmentation. This provides for the on-shift capability to perform dose assessment in the determination of emergency classification, on-site protective action, and offsite protective action recommendations. NUREG-0654 Table B.1 describes that a dose assessment function be available within 30 minutes. This requirement is met by having a qualified individual on shift to perform dose projections until the augmented dose assessment ERO member arrives on site. After staff augmentation, the offsite dose assessment function is performed by qualified dose assessors located in the Emergency Operations Facility.
- P.2. A change made to Table II-2 of the WLS Emergency Plan that was committed to by Duke Energy in a letter dated June 12, 2012 [ML12166A288] and incorporated in the Plan in WLS COLA Submittal 6, states that there will be an individual on-shift with the qualification to perform off-site dose projections until relieved by staff augmentation. In addition to the 75 minute time frame allotted for augmentation, this provision ensures dose assessment timeliness criteria are satisfied. NUREG-0654 Table B.1 describes that a dose assessment function be available within 30 minutes. This requirement is met by having a qualified individual on shift to perform dose projections until the augmented dose assessment ERO member arrives on site.
- Q. Dose assessment functions are performed for Duke Energy facilities using a dose assessment computer program. The program can be performed in the Control Room, TSC, and EOF or at other Duke facilities if necessary. Prior to staff augmentation, off-site dose projections are performed by a qualified individual on-shift. A change made to Table II-2 of the WLS Emergency Plan that was committed to by Duke Energy in a letter dated June 12, 2012 [ML12166A288] and incorporated in the Plan in WLS COLA Submittal 6, states that there will be an individual on-shift with the qualification to perform off-site dose projections until relieved by staff augmentation. Following activation of the emergency response facilities, dose assessment functions are normally completed in the EOF. The EOF is staffed upon declaration of an Alert or higher level emergency.

Associated Revision to the Lee Nuclear Station Final Safety Analysis Report or Emergency Plan:

Duke Energy committed to adding the bullet below to Note 3 in Table II-2 of the WLS Emergency Plan in a letter dated June 12, 2012 [ML12166A288] and incorporated this change in the Part 5 Emergency Plan (Revision 4) in the September 2012 WLS COLA Submittal 6:

- "A Radiation Protection (RP) qualified individual assigned other duties is required to be on-shift with the qualification to perform off-site dose projections until relieved by staff augmentation of the dose assessor position."

Attachments:

None