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Serial: NPD-NRC-2015-016
April 22, 2015

10 CFR 52.79

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U.S. Nuclear Regulatory Commission
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**LEVY NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 52-029 AND 52-030
SUPPLEMENT 9 TO RESPONSE TO NRC RAI LETTER 108 – IMPLEMENTATION OF
FUKUSHIMA NEAR-TERM TASK FORCE RECOMMENDATIONS**

- References:
1. Letter from Mark Tonacci (NRC) to John Elnitsky (PEF), dated March 15, 2012, "Request for Additional Information Letter No. 108 Concerning Implementation of Fukushima Near-Term Task Force Recommendations."
 2. Letter from John Elnitsky (PEF) to Nuclear Regulatory Commission (NRC), dated April 12, 2012, "30-Day Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-012.
 3. Letter from John Elnitsky (PEF) to Nuclear Regulatory Commission (NRC), dated April 25, 2012, "Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-014.
 4. Letter from John Elnitsky (PEF) to Nuclear Regulatory Commission (NRC), dated June 19, 2012, "Supplement 1 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-019.
 5. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC), dated August 1, 2012, "Supplement 2 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-029.
 6. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC), dated September 27, 2012, "Supplement 3 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-033.
 7. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC), dated October 15, 2012, "Supplement 4 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-035.

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8. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC) , dated October 31, 2012, "Revised Supplement 4 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-036.
9. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC) , dated January 18, 2013, "Supplement 5 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2013-001.
10. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC) , dated April 5, 2013, "Supplement 6 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2013-008.
11. Letter from Christopher Fallon (DEF) to Nuclear Regulatory Commission (NRC) , dated May 13, 2013, "Supplement 7 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2013-022.
12. Letter from Christopher Fallon (DEF) to Nuclear Regulatory Commission (NRC) , dated September 25, 2013, "Supplement 8 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2013-041.

Ladies and Gentlemen:

Duke Energy Florida, Inc. (DEF) hereby submits supplemental response number 9 to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) cited in Reference 1. Enclosure 1 provides a supplemental response to bullet 2 of NRC question 01.05-1. Included with this response is a report that provides a description of the mitigation strategies for beyond-design-basis external events for LNP. This report was produced by Westinghouse Electric Company, LLC (Westinghouse) for AP1000 plants. Enclosure 2 contains this proprietary Westinghouse report, APP-GW-GLR-170, "AP1000 FLEX Integrated Plan." Enclosure 3 contains the Westinghouse report, APP-GW-GLR-171, "AP1000 FLEX Integrated Plan (Non-Proprietary Version)." This is a redacted version of APP-GW-GLR-170 and is therefore non-proprietary.

The Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-13-3759 is contained in Enclosure 4 with the accompanying Affidavit. The Proprietary Information Notice and Copyright Notice are contained in Enclosure 5.

As Enclosure 2 contains information proprietary to Westinghouse Electric Company LLC, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in 10 CFR 2.390(b)(4). Accordingly, it is respectfully requested that the information (Enclosure 2) which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-13-3759 and should be addressed


to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Building 3 Suite 310, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

If you have any further questions, or need additional information, please contact Bob Kitchen at (704) 382-4046, or me at (704) 382-9248.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 22, 2015

Sincerely,



Christopher M. Fallon
Vice President
Nuclear Development

Enclosures:

1. Supplemental Response
2. Westinghouse APP-GW-GLR-170, (PROPRIETARY)
3. Westinghouse APP-GW-GLR-171 (Redacted), (NON-PROPRIETARY VERSION)
4. Westinghouse Application Letter CAW-13-3759 and Affidavit
5. Proprietary Information Notice and Copyright Notice

cc : (without enclosures)
U.S. NRC Region II, Regional Administrator

cc : (with enclosures)
Mr. Donald Habib, U.S. NRC Project Manager

Levy Nuclear Plant Units 1 and 2 (LNP)
Supplement 9 to Response to NRC Request for Additional Information Letter No. 108
Related to Implementation of Fukushima Near Term Task Force Recommendations,
Dated 3/15/2012

<u>NRC RAI #</u>	<u>Duke Energy RAI #</u>	<u>Duke Energy Response</u>
01.05-1	L-0998 & L-1016	August 1, 2012; NPD-NRC-2012-029 and October 31, 2012; NPD-NRC-2012-036
01.05-1	L-0999, L-1013, & L-1126	April 25, 2012; NPD-NRC-2012-0014, September 27, 2012; NPD-NRC-2012-033 and supplemental response enclosed – see following pages
01.05-1	L-1000, L-1014, L-1019, L-1029, L-1042, & L-1070	April 25, 2012; NPD-NRC-2012-0014, September 27, 2012; NPD-NRC-2012-033, January 18, 2013; NPD-NRC-2013-001, April 5, 2013; NPD-NRC-2013-008, May 13, 2013; NPD-NRC-2013-022 and September 25, 2013; NPD-NRC-2013-041
01.05-1	L-1002	June 19, 2012; NPD-NRC-2012-019

NRC Letter No.: LNP-RAI-LTR-108

NRC Letter Date: March 15, 2012

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 01.05-1

Text of NRC RAI:

Subject: Request for Additional Information Letter No. 108 Concerning Implementation of Fukushima Near-term Task Force (NTTF) Recommendations

Bullet 2

Provide reasonable protection for equipment currently provided pursuant to 10 CFR 50.54(hh)(2) from the effects of design-basis external events and to add equipment as needed to address multi-unit events while other requirements are being revised and implemented (detailed Recommendation 4.2 - Enclosure 4 of SECY-12-0025).

DEF RAI ID #: L-1126

DEF Response to NRC RAI:

Bullet 2

This response provides additional information about the LNP beyond-design-basis mitigation strategies submitted in response to NRC "Request for Additional Information Letter No. 108 Concerning Implementation of Fukushima Near-Term Task Force Recommendations," dated March 15, 2012. Included in this letter is a report that provides a description of the mitigation strategies for beyond-design-basis external events for LNP. This report was produced by Westinghouse Electric Company, LLC (Westinghouse) for AP1000 plants and is included as Enclosure 2.

APP-GW-GLR-170 (Enclosure 2) has sections describing a milestone schedule and various indications that a milestone schedule is attached. Based on the current status of LNP as a Combined License (COL) applicant, this milestone schedule is not appropriate at this time and is therefore, not included in this submittal.