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May 7, 2015

10CFR52.79

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Duke Energy Carolinas, LLC
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 Letter No. 105
Concerning Implementation of Fukushima Near-Term Task Force
Recommendations (RAI 6419)
Ltr# WLG2015.05-01

References:

1. Letter from Brian Hughes (NRC) to Christopher Fallon (Duke Energy), Request for Additional Information Letter No. 105 Concerning Implementation of Fukushima Near-Term Task Force Recommendations for the William States Lee III Units 1 and 2 Combined License Application, dated April 25, 2012 (ML12116A336)
2. Letter from Christopher M. Fallon (Duke Energy) to the Document Control Desk, Supplemental Response to Request for Additional Information (eRAI No. 6419) Ltr# WLG2012.06-02, dated June 11, 2012 (ML12165A423)
3. Letter from Christopher M. Fallon (Duke Energy) to the Document Control Desk, Supplement 9 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations, Serial: NPD-NRC-2015-016, dated April 22, 2015

In Reference 2, Duke Energy Carolinas (DEC) provided a response to Nuclear Regulatory Commission (NRC) request for additional information (RAI) question 01.05-2 provided in Reference 1. Enclosure 1 provides a supplemental response to NRC RAI question 01.05-2. Included with this response is a report that provides a description of the mitigation strategies for beyond-design-basis external events for Lee. This report was produced by Westinghouse

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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.

In Reference 3, Duke Energy Florida (DEF) identified responses to NRC RAI concerning Implementation of Fukushima Near-Term Task Force Recommendations. DEC concurs with the LNP response to RAI Letter 108 in its entirety. There are no changes to the COLA for Lee Nuclear Station resulting from DEC's concurrence with the LNP RAI response.

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 May 7, 2015.

Sincerely,



Christopher M. Fallon
Vice President
Nuclear Development

Enclosures:

1. Supplemental Response to RAI Letter No. 105 RAI 01.05-2
2. Westinghouse APP-GW-GLR-170, Revision 0 (Proprietary & SRI 2.390)
3. Westinghouse APP-GW-GLR-171, Revision 0 (Redacted) (Non-Proprietary Version)
4. Westinghouse Application Letter CAW-13-3759 and Affidavit
5. Proprietary Information Notice and Copyright Notice

xc (w/out enclosures):
Frederick Brown, Deputy Regional Administrator, Region II

xc (w/ enclosures):
Brian Hughes, Senior Project Manager, DNRL

Enclosure 1

**Lee Nuclear Station Units 1 and 2 Supplemental Response to Request for
Additional Information (RAI)**

RAI Letter No. 105 RAI 01.05-2 (eRAI 6419)

**Supplemental Response to RAI Letter No. 105 RAI 01.05-2
(2 pages including cover page)**

**Lee Nuclear Station Supplemental Response to Request for Additional Information (RAI)
RAI Letter No. 105**

NRC Technical Review Branch: Licensing Branch 4

Reference NRC RAI Number(s): RAI 01.05-2

NRC RAI:

Develop mitigation strategies for beyond-design-basis external events as described in Attachment 3 to Order EA-12-049, (ML12054A735).

Duke Energy Response:

This response provides additional information about the Lee beyond-design-basis mitigation strategies submitted in response to NRC "Request for Additional Information Letter No. 105 Concerning Implementation of Fukushima Near-Term Task Force Recommendations," dated June 11, 2012. Included in this letter is a report that provides a description of the mitigation strategies for beyond-design-basis external events for Lee. 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 WLS as a Combined License (COL) applicant, this milestone schedule is not appropriate at this time and is therefore, not included in this submittal.

Associated Revision to the Lee Nuclear Station Combined License Application:

None

Attachment:

None