

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of)	
)	
DUKE ENERGY CAROLINAS, LLC)	Docket Nos. 52-018-COL
)	52-019-COL
(William States Lee III Nuclear Station,)	
Units 1 and 2))	

REVISIONS TO DRAFT COMBINED LICENSES

The Staff identified a number of necessary corrections and an additional clarification in the draft Combined Licenses (COLs) for William States Lee III Nuclear Station (WLS) Units 1 and 2. If the Commission approves issuance of the COLs, the Staff proposes to include the changes, which are indicated in the table below in bold underlined text, in the final COLs. The Staff informed the applicant of these revisions, and the applicant has no objection to them.

Corrections to William States Lee III Nuclear Station Unit 1 draft COL:

Page and Paragraph	Current Language	Revised Language	Description
Page 11, parag. (d)(6)	Review differences between the as built plant and the design used as the basis for the AP1000 seismic margin analysis. DEC shall perform a verification walkdown to identify differences between the as built plant and the design. DEC shall evaluate any differences and must modify the seismic margin analysis as necessary to account for the plant specific design and any design changes or departures from the certified design. DEC shall compare the as built structures, systems, and components (SSC) high confidence, low probability of failures (HCLPFs) with those	Review differences between the as built plant and the design used as the basis for the AP1000 seismic margin analysis. DEC shall perform a verification walkdown to identify differences between the as built plant and the design. DEC shall evaluate any differences and must modify the seismic margin analysis as necessary to account for the plant specific design and any design changes or departures from the certified design. DEC shall compare the as built structures, systems, and components (<u>SSCs</u>) high confidence, low probability of failures (HCLPFs) with those	This change corrects acronym for structures, systems, and components

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	assumed in the AP1000 seismic margin evaluation, before initial fuel load. DEC shall evaluate deviations from the HCLPF values or assumptions in the seismic margin evaluation due to the as built configuration and final analysis to determine if vulnerabilities have been introduced;	assumed in the AP1000 seismic margin evaluation, before initial fuel load. DEC shall evaluate deviations from the HCLPF values or assumptions in the seismic margin evaluation due to the as built configuration and final analysis to determine if vulnerabilities have been introduced;	
Page 15-19, parag. (e), (f), (g), (h), (i), (j), (k), and (l)		Add <u>(e) [Reserved]</u> All subsequent paragraphs renumbered	This change adds 12.(e) to keep numbering of sections between Unit 1 and Unit 2 consistent
Page 17, parag. (i)	DEC shall distribute the initial WLS public information publications, consistent with the WLS Emergency Plan, within 180 days prior to fuel load at WLS.	DEC shall distribute the initial WLS public information publications, consistent with the WLS Emergency Plan, no later than 180 days prior to fuel load at WLS.	This change clarifies the reporting requirement
Page 18, parag. (i)(6)	The licensee shall maintain the guidance and strategies described in the application upon issuance of the license, and the integrated plan of strategies upon its completion as required by this condition. The licensee may change the strategies and guidelines required by this condition provided that the licensee evaluates each such change to ensure that the provisions of 2.D(12)(j)1 and 2.D(12)(j)2 in this condition continue to be satisfied and the licensee documents the evaluation in an auditable form.	The licensee shall maintain the guidance and strategies described in the application upon issuance of the license, and the integrated plan of strategies upon its completion as required by this condition. The licensee may change the strategies and guidelines required by this condition provided that the licensee evaluates each such change to ensure that the provisions of 2.D ₂ (12)(j) <u>2</u> and 2.D ₂ (12)(j) <u>3</u> in this condition continue to be satisfied and the licensee documents the evaluation in an auditable form.	This change corrects paragraph references within the license condition.
Page 18-19, parag. (k)1 and (k)2	1. Before the scheduled date for initial fuel load, and within ninety (90) days after the NRC publishes the notice of	1. Before the scheduled date for initial fuel load, and within ninety (90) days after the NRC publishes the notice of	This change identifies the applicant/ licensee appropriately

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	<p>intended operation in the Federal Register, Duke shall provide satisfactory documentary evidence to the Director of the Office of Nuclear Reactor Regulation, or designee, that it has obtained the appropriate amount of primary and secondary financial protection required of licensees pursuant to 10 CFR 140.11(a)(4) and the appropriate amount of financial protection per 10 CFR 50.54(w).</p> <p>2. Before the scheduled date of initial fuel load, and within ninety (90) days after the NRC publishes the notice of intended operation in the Federal Register, Duke shall provide evidence to the NRC that it would have the ability to pay into the nuclear industry retrospective rating plan in the event of a nuclear incident and in the amount specified in 10 CFR Part 140.11(a)(4) for one calendar year using one of the following methods:</p> <p>a. Surety bond,</p> <p>b. Letter of credit,</p> <p>c. Revolving credit/term loan arrangement,</p> <p>d. Maintenance of escrow deposits of government securities, or</p>	<p>intended operation in the Federal Register, DEC shall provide satisfactory documentary evidence to the Director of the Office of Nuclear Reactor Regulation, or designee, that it has obtained the appropriate amount of primary and secondary financial protection required of licensees pursuant to 10 CFR 140.11(a)(4) and the appropriate amount of financial protection per 10 CFR 50.54(w).</p> <p>2. Before the scheduled date of initial fuel load, and within ninety (90) days after the NRC publishes the notice of intended operation in the Federal Register, DEC shall provide evidence to the NRC that it would have the ability to pay into the nuclear industry retrospective rating plan in the event of a nuclear incident and in the amount specified in 10 CFR Part 140.11(a)(4) for one calendar year using one of the following methods:</p> <p>a. Surety bond,</p> <p>b. Letter of credit,</p> <p>c. Revolving credit/term loan arrangement,</p> <p>d. Maintenance of escrow deposits of government securities, or</p>	

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	<p>e. Annual certified financial statement showing either that a cash flow (i.e., cash available to a company after all operating expenses, taxes, interest charges, and dividends have been paid) can be generated and would be available for payment of retrospective premiums within three (3) months after submission of the statement, or a cash reserve or a combination of cash flow and cash reserve.</p> <p>Thereafter, DEC shall provide evidence of the guarantees of payment of deferred premiums in accordance with the provisions specified in 10 CFR 140.21.</p>	<p>e. Annual certified financial statement showing either that a cash flow (i.e., cash available to a company after all operating expenses, taxes, interest charges, and dividends have been paid) can be generated and would be available for payment of retrospective premiums within three (3) months after submission of the statement, or a cash reserve or a combination of cash flow and cash reserve.</p> <p>Thereafter, DEC shall provide evidence of the guarantees of payment of deferred premiums in accordance with the provisions specified in 10 CFR 140.21.</p>	
Page 22, parag. (b)	a. WLS DEP 6.4-1 (exemption from Tier 1)	a. WLS DEP 6.4-1 (exemption from Tier 1 <u>and generic technical specifications</u>)	This change corrects the description of the exemption for main control room dose, consistent with the FSER evaluation.

Corrections to William States Lee III Nuclear Station Unit 2 draft COL:

Page and Paragraph	Current Language	Revised Language	Description
Page 11, parag. (d)(6)	Review differences between the as built plant and the design used as the basis for the AP1000 seismic margin analysis. DEC shall perform a verification walkdown to identify differences between the as built plant and the	Review differences between the as built plant and the design used as the basis for the AP1000 seismic margin analysis. DEC shall perform a verification walkdown to identify differences between the as built plant and the	This change corrects acronym for structures, systems, and components

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	<p>design. DEC shall evaluate any differences and must modify the seismic margin analysis as necessary to account for the plant specific design and any design changes or departures from the certified design. DEC shall compare the as built structures, systems, and components (SSC) high confidence, low probability of failures (HCLPFs) with those assumed in the AP1000 seismic margin evaluation, before initial fuel load. DEC shall evaluate deviations from the HCLPF values or assumptions in the seismic margin evaluation due to the as built configuration and final analysis to determine if vulnerabilities have been introduced;</p>	<p>design. DEC shall evaluate any differences and must modify the seismic margin analysis as necessary to account for the plant specific design and any design changes or departures from the certified design. DEC shall compare the as built structures, systems, and components (SSC<u>s</u>) high confidence, low probability of failures (HCLPFs) with those assumed in the AP1000 seismic margin evaluation, before initial fuel load. DEC shall evaluate deviations from the HCLPF values or assumptions in the seismic margin evaluation due to the as built configuration and final analysis to determine if vulnerabilities have been introduced;</p>	
<p>Page 17, parag. (i)</p>	<p>DEC shall distribute the initial WLS public information publications, consistent with the WLS Emergency Plan, within 180 days prior to fuel load at WLS.</p>	<p>DEC shall distribute the initial WLS public information publications, consistent with the WLS Emergency Plan, <u>no later than</u> 180 days prior to fuel load at WLS.</p>	<p>This change clarifies the reporting requirement</p>
<p>Page 18, parag. (j)(6)</p>	<p>The licensee shall maintain the guidance and strategies described in the application upon issuance of the license, and the integrated plan of strategies upon its completion as required by this condition. The licensee may change the strategies and guidelines required by this condition provided that the licensee evaluates each such change to ensure that the provisions of 2.D(12)(j)1 and 2.D(12)(j)2 in this condition continue to be satisfied and the licensee documents the evaluation in an auditable form.</p>	<p>The licensee shall maintain the guidance and strategies described in the application upon issuance of the license, and the integrated plan of strategies upon its completion as required by this condition. The licensee may change the strategies and guidelines required by this condition provided that the licensee evaluates each such change to ensure that the provisions of 2.D₁(12)(j)<u>2</u> and 2.D₁(12)(j)<u>3</u> in this condition continue to be satisfied and the licensee documents the evaluation in an auditable form.</p>	<p>This change corrects paragraph references within the license condition.</p>

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	<p>d. Maintenance of escrow deposits of government securities, or</p> <p>e. Annual certified financial statement showing either that a cash flow (i.e., cash available to a company after all operating expenses, taxes, interest charges, and dividends have been paid) can be generated and would be available for payment of retrospective premiums within three (3) months after submission of the statement, or a cash reserve or a combination of cash flow and cash reserve.</p> <p>Thereafter, DEC shall provide evidence of the guarantees of payment of deferred premiums in accordance with the provisions specified in 10 CFR 140.21.</p>	<p>d. Maintenance of escrow deposits of government securities, or</p> <p>e. Annual certified financial statement showing either that a cash flow (i.e., cash available to a company after all operating expenses, taxes, interest charges, and dividends have been paid) can be generated and would be available for payment of retrospective premiums within three (3) months after submission of the statement, or a cash reserve or a combination of cash flow and cash reserve.</p> <p>Thereafter, DEC shall provide evidence of the guarantees of payment of deferred premiums in accordance with the provisions specified in 10 CFR 140.21.</p>	
Page 22, parag. (b)	b. WLS DEP 6.4-1 (exemption from Tier 1)	b. WLS DEP 6.4-1 (exemption from Tier 1 <u>and generic technical specifications</u>)	This change corrects the description of the exemption for main control room dose, consistent with the FSER evaluation.

/Signed (electronically) by/

Megan A. Wright
Counsel for NRC Staff
U.S. Nuclear Regulatory Commission
Mail Stop O-16 F-03
Washington, DC 20555-0001
(972) 294-5792
Megan.Wright@nrc.gov

Dated at Rockville, Maryland
This 14th day of September 2016

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CERTIFICATE OF SERVICE

I hereby certify that the document entitled REVISIONS TO DRAFT COMBINED LICENSES, dated September 14, 2016, has been filed through the E-Filing system this 14th day of September, 2016.

/Signed (electronically) by/

Megan A. Wright
Counsel for NRC Staff
U.S. Nuclear Regulatory Commission
Mail Stop O-16 F-03
Washington, DC 20555-0001
(972) 294-5792
Megan.Wright@nrc.gov

Dated at Rockville, Maryland,
this 14th day of September 2016