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10 CFR 50.90
10 CFR 50, Appendix E, IV.E.8.b
10 CFR 50.54(q)(4)

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

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325, 50-324 / RENEWED LICENSE NOS. DPR-71 AND DPR-62

CATAWBA NUCLEAR STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-413, 50-414 / RENEWED LICENSE NOS. NPF-35 AND NPF-52

MCGUIRE NUCLEAR STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-369, 50-370 / RENEWED LICENSE NOS. NPF-9 AND NPF-17

OCONEE NUCLEAR STATION, UNIT NOS. 1, 2 AND 3
DOCKET NOS. 50-269, 50-270, AND 50-287 / RENEWED LICENSE NOS. DPR-38, DPR-47,
AND DPR-55

**SUBJECT: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI)
REGARDING APPLICATION FOR EMERGENCY OPERATIONS FACILITY
(EOF) CONSOLIDATION**

REFERENCES:

1. Duke Energy letter, *Request for Emergency Operations Facility (EOF) Consolidation*, dated April 29, 2016 (ADAMS Accession No. ML16120A076)
2. NRC email, *Duke Energy Fleet RAIs – License Amendment Request For Emergency Operations Facility (EOF) Consolidation (MF7650 to MF7660)*, dated September 1, 2016 (ADAMS Accession No. ML16250A033)

Ladies and Gentlemen:

In Reference 1, Duke Energy Progress, LLC (formerly referred to as Duke Energy Progress, Inc.) and Duke Energy Carolinas, LLC, referred to henceforth as “Duke Energy,” submitted a request to consolidate the Emergency Operations Facilities (EOFs) for Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP), Shearon Harris Nuclear Power Plant, Unit 1 (HNP), and H. B. Robinson Steam Electric Plant, Unit No. 2 (RNP) with the Duke Energy corporate

EOF (hereafter referred to as the Charlotte EOF) in Charlotte, North Carolina. In Reference 2, the NRC requested additional information (RAI) regarding this submittal. Attachment 1 restates the NRC RAIs and provides Duke Energy's response.

This submittal contains no new regulatory commitments. In accordance with 10 CFR 50.91, Duke Energy is notifying the states of North Carolina and South Carolina by transmitting a copy of this letter to the designated state officials. Should you have any questions concerning this letter, or require additional information, please contact Art Zaremba, Manager – Nuclear Fleet Licensing, at 980-373-2062.

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

Executed on October 3, 2016.

Sincerely,



John Elnitsky
Senior Vice President – Nuclear Engineering

JBD

Attachments: 1. Response to NRC Request for Additional Information

cc: (all with Attachments unless otherwise noted)

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ONS Master File 801.01 – ON03DM

Pam Metler (For ONS Licensing/Nuclear Records Files)

Attachment 1
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Attachment 1

Response to NRC Request for Additional Information

NRC RAI 1:

(Pages 4-5) Enclosure 1, Section 2.0 of the submittal states:

Prior to NRC approval of the proposed change, Duke Energy will conduct a two-site simultaneous drill (with NRC observation) involving at least one of the new sites. An additional drill (or drills) will be performed to test the functionality of the Duke Charlotte EOF with the remaining untested new sites prior to their implementation into the Duke Charlotte EOF. Furthermore, the multi-site event is tested at the Duke Charlotte EOF on a periodic basis. The ONS Emergency Plan includes a requirement to perform a two-site drill every 6 years.

- a. Please identify the proposed date(s) and provide further details on the scope/extent of play for proposed drill to test the functionality of the Duke Charlotte EOF, involving simultaneous events at two sites, at least one of which will be a new (former Progress Energy site. [NOTE: Staff would suggest that the Brunswick site participate in drill to demonstrate ability of consolidated EOF to support events involving both pressurized water reactor (PWR) and boiling water reactor (BWR) technologies.]
- b. Please verify that the States of North Carolina and South Carolina will be offered the opportunity to participate, as appropriate, to verify their interfaces and coordination with the Duke Charlotte EOF for the addition of new sites.
- c. Please verify that in addition to the NRC, the Federal Emergency Management Agency (FEMA) will also be offered the opportunity to observe to verify continued adequacy of offsite emergency preparedness plans and preparedness.
- d. Please clarify the frequency for conducting a periodic drill involving simultaneous events at multiple sites to periodically test and verify functional capability of the Duke Charlotte EOF to support simultaneous events at multiple sites requiring EOF activation. Does Duke Energy plan to continue 6 year periodicity as described in the ONS Emergency Plan?

Duke Energy Response to RAI 1:

- a. Duke Energy plans to conduct the two-site drill on June 21, 2017 with the Brunswick and Oconee nuclear stations. The drill at each site will involve activation of the emergency response organization and facilities, offsite notifications, dose assessment, protective action recommendations, and field monitoring team coordination. The event at one of the two sites will affect multiple units.
- b. Duke Energy will offer the States of North Carolina and South Carolina the opportunity to participate, as appropriate, in the two-site simultaneous drill to verify their interfaces and coordination with the Duke Charlotte EOF for the addition of new sites.
- c. Duke Energy will offer FEMA the opportunity to observe the two-site simultaneous drill to verify continued adequacy of offsite emergency preparedness plans and preparedness.
- d. Duke Energy requests NRC approval to change the ONS Emergency Plan frequency for a multi-site drill from 6 years to 8 years. The proposed 8 year frequency aligns with the 8 year exercise cycle described in 10 CFR 50 Appendix E, Section IV.F.2.j. The ONS 6 year

frequency was created prior to establishment of the 8 year exercise cycle in 10 CFR Appendix E (2011 rule change). The 2011 rule change (FR 72590) established an 8 year frequency versus a 6 year frequency in order to preserve variability of scenario challenges, considering the new scenario content requirements that were also included in the rule change. Similarly, extending the ONS multi-site drill frequency would aid in preserving variability of scenario challenges. If the 6 year frequency is maintained, eventually there would be two multi-site drills required to be performed in one 8 year cycle. Lastly, this request is further supported by the successful performance of the two multi-site drills since inception of the requirement (drills in 2005 and 2011).

In addition to the frequency change, Duke Energy requests to change the ONS Emergency Plan to allow the multi-site drill performance with sites other than Oconee, McGuire, or Catawba (the ONS Emergency Plan currently specifies these three sites). The new multi-site drill requirement would allow performance of the drill with any two sites that the Charlotte EOF supports and the requirement would also be moved from the ONS Emergency Plan into the procedure governing Duke Energy Emergency Preparedness drill performance. Performance of the drill with any two sites does not diminish or alter the quality of testing the ability of the Charlotte EOF to respond to simultaneous events. Furthermore, movement of the requirement from the Emergency Plan to a procedure will continue to ensure the drill is performed and any changes to the requirement will continue to be evaluated under 10 CFR 50.54(q).

NRC RAI 2:

(Pages 4-5) Enclosure 1, Section 2.0 of the submittal also states:

To support the continued adequacy of this two-site requirement after the addition of BSEP, HNP, and RNP to the Duke Charlotte EOF, a historical search of emergency declarations was performed. A sample period of approximately 10 years was selected (January 1, 2006 to March 30, 2016). This time period was selected to provide an adequate number of data points but to also be representative of current performance. The search consisted of any emergency declaration (Notice of Unusual Event or higher) for the six Duke Energy sites that will be combined into the requested consolidated EOF.

To ensure the adequacy of the scope for the historical search, please provide and describe the results for emergency declarations for all six proposed Duke sites that would require activation of the Duke Charlotte EOF, for the time period from the implementation of the existing emergency classification levels (under Revision 1 to NUREG-0654/FEMA-REP-1 "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," dated November 1980 (ADAMS Accession No. ML040420012)) to March 30, 2016.

Duke Energy Response to RAI 2:

All six proposed Duke Energy sites (Catawba, McGuire, Oconee, Harris, Robinson, and Brunswick) require EOF activation upon an Alert or higher emergency declaration. Therefore, a search was performed from November 1, 1980 to March 30, 2016 for Alert or higher declarations at those six sites. The results are provided in Table 1, which also shows the number of days between each of the events. As can be seen in Table 1, the two closest events were 18 days apart (Brunswick Alert on 9/21/1989 followed by Harris Alert on 10/9/1989). The next closest events were 28 days apart (Brunswick Alert on 2/7/2016 followed by Oconee Alert on 3/6/2016).

Note that this search was performed to the best of Duke Energy's ability with information that was readily available. Availability and/or reliability of source data was lower for the time period prior to the early 2000's. No single source contained the entire scope of information. Sources included Duke internal information, previously docketed information, NRC website databases, and a vendor database.

TABLE 1 – EMERGENCY DECLARATIONS, ALERT OR HIGHER

NRC EVENT NOTIFICATION #	CLASS. LEVEL	PLANT	TITLE / DESCRIPTION	EVENT DATE	DAYS BETWEEN
51770	ALERT	OCONEE	EMERGENCY DECLARATION DUE TO FIRE/EXPLOSION IN THE MAIN TRANSFORMER	3/6/2016	28
51715	ALERT	BRUNSWICK	MANUAL SCRAM AND ALERT DECLARATION DUE TO ELECTRICAL FAULT RESULTING IN FIRE/EXPLOSION	2/7/2016	750
49742	ALERT	HARRIS	ALERT DECLARED DUE TO FIRE IN 480V BUS	1/18/2014	163
49249	ALERT	HARRIS	ALERT DECLARED DUE TO A SWITCHGEAR EXPLOSION THAT SUPPLIES SAFE SHUTDOWN EQUIPMENT	8/8/2013	594
47551	ALERT	ROBINSON	ALERT DECLARED DUE TO HALON DISCHARGE DURING TESTING	12/23/2011	214
46873	ALERT	BRUNSWICK	ALERT DECLARED DUE TO HALON DISCHARGE IN EMERGENCY DIESEL GENERATOR BUILDING	5/23/2011	351
45980	ALERT	BRUNSWICK	BRUNSWICK DECLARED ALERT DUE TO HALON DISCHARGE IN EMERGENCY DIESEL GENERATOR BUILDING	6/6/2010	70
45799	ALERT	ROBINSON	ALERT DECLARED DUE TO FIRE AFFECTING SAFETY RELATED EQUIPMENT	3/28/2010	3833
36243	ALERT	ROBINSON	ALERT DECLARED DUE TO THE SIGHTING OF A TORNADO WITHIN THE PROTECTED AREA	9/29/1999	1562
28968	ALERT	ROBINSON	ALERT DECLARED AND TERMINATED AT 1803 EDT DUE TO REACTOR COOLANT SYSTEM LEAKAGE IN EXCESS OF 50 GALLONS PER MINUTE DUE TO A FAILED CHARGING PUMP RELIEF VALVE	6/20/1995	127

TABLE 1 – EMERGENCY DECLARATIONS, ALERT OR HIGHER

NRC EVENT NOTIFICATION #	CLASS. LEVEL	PLANT	TITLE / DESCRIPTION	EVENT DATE	DAYS BETWEEN
28376	ALERT	ROBINSON	AN ALERT WAS DECLARED DUE TO A RELEASE OF TOXIC GAS INTO A VITAL AREA	2/13/1995	252
27355	ALERT	ROBINSON	UNIT 2 DECLARED AN ALERT DUE TO A LUBE OIL FIRE ON THE EXHAUST MANIFOLD OF THE "A" EDG DURING SURVEILLANCE TESTING	6/6/1994	294
25927	ALERT	ROBINSON	DURING AN OPERABILITY TEST RUN OF THE "A" TRAIN EMERGENCY DIESEL GENERATOR, THE OPERATOR STATIONED AT THE DIESEL OBSERVED A SMALL FIRE ON THE DIESEL EXHAUST MANIFOLD LAGGING.	8/16/1993	320
24338	ALERT	ROBINSON	A CO2 LEAK DEVELOPED FROM CO2 STORAGE BOTTLES IN THE PLANT'S PIPE ALLEY.	9/30/1992	168
23241	ALERT	ROBINSON	ALERT DECLARED DUE TO UNPLANNED RELEASE OF CO2 IN A CABLE PENETRATION ROOM OUTSIDE CONTAINMENT NECESSITATING EVACUATION OF PERSONNEL.	4/15/1992	144
22306	ALERT	OCONEE	PLANT HAS A REACTOR COOLANT SYSTEM(RCS) LEAKAGE GREATER THAN 50 GPM.	11/23/1991	438
19333	ALERT	ROBINSON	AN UNUSUAL EVENT WAS DECLARED AS A RESULT OF AN UNPLANNED RELEASE OF TOXIC GAS (FREON) IN THE PROTECTED AREA.	9/11/1990	263

TABLE 1 – EMERGENCY DECLARATIONS, ALERT OR HIGHER

NRC EVENT NOTIFICATION #	CLASS. LEVEL	PLANT	TITLE / DESCRIPTION	EVENT DATE	DAYS BETWEEN
17411	ALERT	BRUNSWICK	ALERT AT 1545 DUE TO LOSS OF AUDIBLE ANNUNCIATORS FOR GREATER THAN 15 MINUTES.	12/22/1989	74
16805	ALERT	HARRIS	THE LICENSEE DECLARED AN ALERT AT 2335 10/09/89 DURING A FIRE IN THE "B" MAIN GENERATOR AND MAIN TRANSFORMER WHILE A FLAMMABLE GAS (HYDROGEN) WAS ESCAPING INTO THE PROTECTED AREA.	10/9/1989	18
16655	ALERT	BRUNSWICK	"ALERT" DUE TO THE LOSS OF CONTROL ROOM ANNUNCIATORS FOR GREATER THAN 15 MINUTES.	9/21/1989	147
15461	ALERT	BRUNSWICK	LICENSEE DECLARED "ALERT" AND IMMEDIATELY DOWNGRADED IT TO AN "UNUSUAL EVENT" AFTER EXTINGUISHING A FIRE IN THE "2B" NUCLEAR SERVICE WATER PUMP	4/27/1989	51
14963	ALERT	MCGUIRE	A MANUAL RX TRIP/TURBINE TRIP(FOLLOWING MANUAL TURBINE RUNBACK) WAS INITIATED WHEN OPERATORS RECEIVED INDICATION OF A PRIMARY/SECONDARY COOLANT LEAK INTO THE "B" S/G. INITIAL ESTIMATES INDICATE THAT THE LEAK WAS APPROXIMATELY 100-150 GPM AT THE START OF THE EVENT.	3/7/1989	177

TABLE 1 – EMERGENCY DECLARATIONS, ALERT OR HIGHER

NRC EVENT NOTIFICATION #	CLASS. LEVEL	PLANT	TITLE / DESCRIPTION	EVENT DATE	DAYS BETWEEN
13426	ALERT	OCONEE	UNIT TEMPORARILY LOST RHR FUNCTION WHILE PERFORMING A TEST ON EMERGENCY POWER SWITCHING LOGIC. THE UNIT WAS OPERATING WITH 1 DECAY HEAT REMOVAL PUMP IN OPERATION.	9/11/1988	30
13170	ALERT	HARRIS	WITH THE PLANT IN REFUELING, THE NORMAL POWER SUPPLY TO 18 OF 30 ANNUNCIATOR PANELS ON THE MAIN CONTROL ROOM BOARD FAILED AND DID NOT TRANSFER TO THE BACKUP INVERTER.	8/12/1988	734
5829	ALERT	CATAWBA	BETWEEN 0715 AND 0720, WITH UNIT IN MODE 3, 'B' RCP EXPERIENCED SEAL FAILURE RESULTING IN ABOUT 60 gpm PRIMARY COOLANT LEAKAGE (ALERT IS DECLARED FOR ANYTHING OVER 50 gpm.)	8/9/1986	439
941	ALERT	ROBINSON	DURING THE D/G TEST RUN OF THE "A" DIG, A FIRE WAS FOUND IN A PENETRATION FOR THE "A" DIG EXHAUST WHERE IT ENTERS THE "B" D/G ROOM FROM THE HALLWAY BETWEEN THE TWO DIG ROOMS. THE "A" DIG WAS SHUTDOWN AND THE FIRE WAS EXTINGUISHED IN 8 MINUTES.	5/27/1985	32
574	ALERT	OCONEE	THE KX INVERTER POWER SUPPLY WAS LOST (CAUSE UNKNOWN), NORMALLY THE INVERTER WOULD SWAP TO THE AC LINE POWER SOURCE BUT DID NOT DUE TO A BLOWN FUSE. THIS RESULTED IN THE LOSS OF MOST OF THE CONTROL ROOM ANNUNCIATORS.	4/25/1985	N/A

NRC RAI 3:

(Page 6) Enclosure 1, Section 3.1 #4, "Notification of offsite agencies," of Enclosure 1 to the submittal states:

The Charlotte EOF has a sufficient number of workstations and personnel designated to communicate with offsite agencies in order to support communications for more than one site simultaneously.

(Page 9) Section 3.1 #10, "Analyzing plant technical information and providing technical briefings on event conditions and prognosis to licensee staff and offsite agency responders for each type of unit or plant," of Enclosure 1 to the submittal states:

The Charlotte EOF will have the capability to access key plant parameters from BSEP, HNP, and RNP as described in Sections 3.7 and 3.8. Knowledge of these parameters allows the EOF staff to assess the severity of an accident, project the accident's course, and provide utility management with information needed for mitigation, recovery, and protective action recommendations. The Duke Charlotte EOF has the sufficient number of workstations to monitor conditions at more than one site simultaneously.

(Page 10) Section 3.1 #11, "Effectively responding to and coordinating response efforts for events occurring simultaneously at more than one site for a consolidated EOF," of Enclosure 1 to the submittal indicates that, "...Duke Energy intends to maintain the current Charlotte EOF ability to support simultaneous events at up to two sites..."

Section 3.1 #11 goes on to state:

The Charlotte EOF is equipped with facilities to monitor and analyze events at more than one site... and ...In addition, the capability is provided to support communications to offsite agencies for more than one event. If Duke Charlotte EOF must respond to an event at more than one site simultaneously, the normal EOF staff complement is augmented with additional personnel as needed.

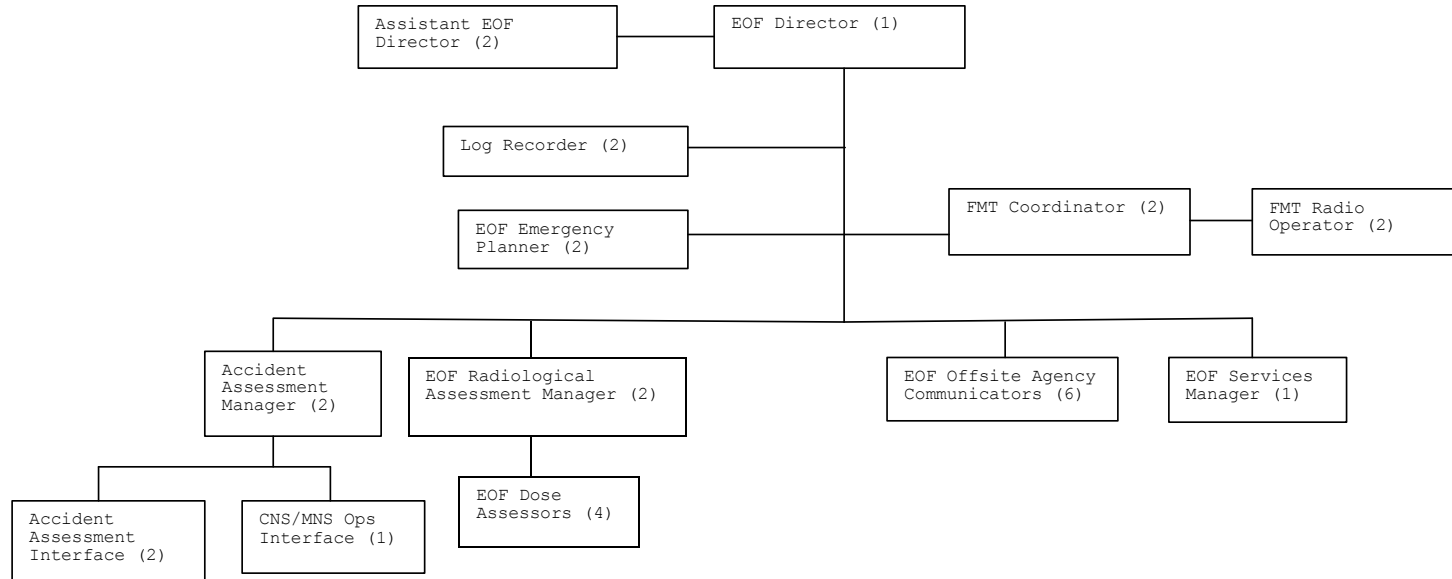
On August 2-3, 2016, the NRC staff performed a walk down of the Duke Charlotte EOF. During the NRC staff's walk down, it was verbally indicated to the staff that the facility could support a simultaneous response for events at more than two sites. As identified above, Duke Energy describes processes and protocols for accommodating simultaneous responses at up to two sites. Please describe facility capabilities and what process and protocols have been established to support accommodating simultaneous responses at more than two sites. Include how Duke would further staff the facility, establish command and control, and effectively coordinate event response during multi-site simultaneous events.

Duke Energy Response to RAI 3:

The Charlotte EOF was designed with the physical capabilities (e.g. space, equipment, etc) to support simultaneous responses for up to three sites. As Duke Energy has not committed to (and is not committing to in this response) supporting events at more than two sites simultaneously, a formal process for this scenario has not been established. However, with regard to staffing, command and control, and coordination, the Charlotte EOF would expand from two to three sites in a corresponding manner as the existing process for expanding from one to two sites (see Figure B-11 below from the ONS Emergency Plan, which shows the EOF organization for a two site event). The normal EOF staff complement would be augmented with

additional personnel as needed, particularly for those positions which could not reasonably perform their responsibilities for multiple sites. The EOF Director would assume overall responsibility, whereas there would be an Assistant EOF Director for each affected site. The main EOF area contains three segregated areas each with its own equipment (e.g. computers, phones, wall displays) to support the EOF functions for each affected site. The rooms surrounding the main EOF area with major support functions (e.g. offsite communications, radiation assessment, accident assessment, offsite monitoring) also include separate space and equipment for up to three sites. Since sufficient space and equipment is available for the key positions to support three simultaneous events, each position would be able to follow their normal process for completing their responsibilities. Furthermore, visual aids such as color coding would be used to differentiate staff for the different sites. Finally, as stated in Section 3.1.1 of the subject license amendment, the Technical Support Center (TSC) will serve as a backup to the EOF. This would allow the flexibility of the TSC for any of the sites to perform the EOF functions. This could be for the duration of the event or the responsibilities could be transferred between facilities as needed, likely depending on event severity.

FIGURE B-11
OCONEE NUCLEAR STATION
Common EOF - Multi-Site Event Staffing



1. Notification Devices activated for second unit - all call response
2. Assistant EOF Director assumes responsibility as lead manager for designated Site
3. Additional Log Keeper retained to support 2nd Site
4. Additional Accident Assessment Manager retained to support 2nd Site
5. Additional Dose Assessor retained to support 2nd Site
6. Additional FMT Coordinator retained to support 2nd Site
7. Additional FMT Radio Operator retained to support 2nd Site
8. Four additional Offsite Communicators as needed to support both Sites
9. Additional Emergency Planner as needed to support 2nd Site
10. Additional Radiological Assessment Manager as needed to support 2nd Site
11. Additional Assistant EOF Director as needed to support 2nd Site
12. Oconee Ops Interface position is staffed in the ONS TSC
13. Additional Accident Assessment Interface as needed to support 2nd Site

NRC RAI 4:

Page 2 of the submittal letter states:

This amendment requests increasing the number of sites supported by the Charlotte EOF from three to six. It is noted that a combined license (COL) application has been submitted to the NRC for William States Lee III Nuclear Station (WLS) that also proposes utilizing the Charlotte EOF. Subsequent to approval of this amendment and the WLS COL, Duke Energy recognizes that prior to commencing operation at WLS, an additional license amendment would need to be approved by the NRC regarding the addition of WLS to the six-site Charlotte EOF.

Based on the pending Commission's approval, under consideration as part of the WLS COL application, the EOF for the WLS would be incorporated into the existing Charlotte EOF, which only describes the existing Catawba, McGuire and Oconee sites. As such, based on Commission approval of the WLS COL application, Duke Energy will need to supplement its existing LAR submittal to address the addition of the WLS to support the staff continued evaluation.

During a July 14, 2016 planning and scheduling phone call, the staff and Duke Energy discussed the possibility of Duke Energy submitting a supplement to the existing April 29, 2016 LAR submittal if the WLS operating license is issued. Please clarify the time line for Duke Energy's submittal of a supplement to the existing April 29, 2016 LAR submittal if the WLS operating license is issued.

Duke Energy Response to RAI 4:

Duke Energy will submit a supplement to the existing April 29, 2016 LAR acknowledging the addition of WLS to the Charlotte EOF within 30 days of issuance of the WLS operating license.