



Joe Donahue  
Vice President  
Nuclear Engineering

526 S. Church Street  
Charlotte, NC 28202

980-373-1758

Joseph.Donahue@duke-energy.com

Serial: NPD-NRC-2018-001  
January 25, 2018

10 CFR 52, Appendix D, X.B  
10 CFR 50.59

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

WILLIAM STATES LEE III NUCLEAR STATION, UNITS 1 AND 2  
COMBINED LICENSE NOS. NPF-101 AND NPF-102  
DOCKET NOS. 52-018 AND 52-019

**SUBJECT: REPORT OF 10 CFR 50.59 CHANGES, TESTS AND EXPERIMENTS AND  
10 CFR 52 APPENDIX D DEPARTURES**

This submission is made with regard to the William States Lee III Nuclear Station (WLS), Units 1 and 2, in accordance with the reporting requirements of 10 CFR 50.59(d)(2) and 10 CFR 52, Appendix D, paragraphs X.B.1 and X.B.3.b.

For the period July 1, 2017 through December 31, 2017, there were no changes, tests or experiments made pursuant to 10 CFR 50.59(c) for WLS Units 1 and 2.

Enclosure 1 provides a report containing a brief description of plant-specific departures, including a summary of the evaluation of each, as required by 10 CFR 52, Appendix D, paragraphs X.B.1 and X.B.3.b, for the period of July 1, 2017 through December 31, 2017.

This letter contains no new regulatory commitments.

If you have any questions, or need additional information, please contact me or Erik Wagner at (704) 382-3949.

Sincerely,

Joe Donahue  
Vice President - Nuclear Engineering

cc: U.S. NRC Region II, Regional Administrator  
Mr. Brian Hughes, U.S. NRC Project Manager

Enclosure 1: WLS Units 1 and 2, 10 CFR 52, Appendix D Departure Report For the Period  
July 1, 2017 through December 31, 2017

IE47  
D093  
NRD

**NPD-NRC-2018-001**

**Enclosure 1**

**WLS Units 1 and 2**

**10 CFR 52, Appendix D Departure Report**

**For the Period July 1, 2017 through December 31, 2017**

**(4 pages including cover)**

**Departure Number:** LBDCR 2017-069

**Title:** Auxiliary Building Security Changes (APP-FSAR-GLN-014)

**Activity Description**

This activity updates physical security-related design features in the Auxiliary Building to reflect the current building design. The changes modify walls in the Auxiliary Building which serve to protect personnel and equipment from external threats. Specifically, the change involves removal of selected gun ports which are no longer needed to support security officer response.

**Summary of the Evaluation**

By modifying physical security-related design features, the walls' design functions are unchanged. The implementation of this activity continues to satisfy the requirements of the Security Plan and no security design function is adversely affected. The structural requirements, along with the Seismic Category I classification, will continue to apply to the redesigned walls within the Auxiliary Building. The building design continues to meet the codes and standards within ACI 349-01 and ANSI/AISC N690. There is no impact to any fire area. There is no impact on the Aircraft Impact Assessment. There is no adverse impact on any procedure, method of control, analysis method or test or experiment. The changes do not have an impact on ex-vessel severe accident consequences. A 10 CFR 50.59 / 10 CFR 52 Appendix D Section VIII review determined that prior NRC approval is not required.

**Departure Number:** LBDCR 2017-071

**Title:** Relocation of Aircraft Impact Assessment (AIA) Blast Doors and Addition of Shielding Doors to Annulus Personnel Access Portals and App 19F Change (APP-FSAR-GLN-134)

**Activity Description**

This change revises the description of three existing doors that are used to access the annulus region and a new door is added in each of these access ways. Specifically, this change adds three new 5 PSID and fire rated doors in existing access ways at the inside wall of the annulus (5 PSID and fire rated doors were originally located at these access ways as the outer doors) and revises the description of the corresponding outer doors to radiation shield doors for penetrations from three rooms to the Shield Building annulus. The fire protection boundary is not affected by installation of the fire rated doors at the inside wall of the annulus, and physical arrangement of the boundary of plant structures is not affected. In addition, changes to Subsection 19F.4.1 are made to clarify that the Auxiliary Building provides protection to equipment necessary to manually actuate equipment needed for reactor core cooling. These changes are revisions resulting from an NRC inspection to satisfy the requirements of 10 CFR 50.150, "Aircraft Impact Assessment".

**Summary of the Evaluation**

The addition of 5 PSID and fire rated doors to the three existing annulus region access ways does not require a Tier 1, Tier 2\* or Technical Specification change.

The addition of 5 PSID and fire rated doors to the three existing annulus region access ways does not adversely affect any design function, involve a procedure or method of control that affects the performance of a design function, involve a method of evaluation in the plant-specific DCD or Updated FSAR, involve a test or experiment, nor a design feature credited in the ex-vessel severe accident assessment. A 10 CFR 50.59 / 10 CFR 52 Appendix D Section VIII review determined that prior NRC approval is not required.

**Departure Number:** LBDCR 2017-080

**Title:** Justifications for Deviation (JFD) for Integrated Final Safety Analysis Report (IFSAR)

**Activity Description**

For the William States Lee III Nuclear Station (WLS) Units 1 and 2, two separate documents were used to establish the IFSAR. The two documents are: 1) Site-specific FSAR from the combined license (COL) application phase; and 2) Westinghouse AP1000 Design Control Document (DCD) Tier 2. The IFSAR was established by incorporating into the site-specific FSAR information from the DCD and other documents previously incorporated by reference. To facilitate ease of use, it is desirable to establish a single document that will constitute the IFSAR.

During the course of the integration process, incompatible formatting and numbering schemes were encountered. In addition, editorial and grammatical errors were identified, and corrected as part of the integration process. Also, text was deleted in DCD COL information and in site-specific FSAR COL information when the text was used to reference the source document (AP1000 DCD). Each of the changes was categorized under a generic change classification. Each category of change included a justification for deviation (JFD) from the source licensing document and each JFD was justified to be a non-technical change.

**Summary of the Evaluation**

The changes that are being made to accomplish the integration into a single document are non-technical in nature. The technical content and licensing basis are not changed by this activity. The changes do not affect a design function of any structure, system, or component described in the FSAR, do not affect the performance or method of control of a design function described in the FSAR, do not affect a method of evaluation or represent an alternative method from that described in the FSAR, do not represent a test or experiment not described in the FSAR, and do not affect a design feature credited in the ex-vessel severe accident assessment in the FSAR. A 10 CFR 50.59 / 10 CFR 52 Appendix D Section VIII review determined that prior NRC approval is not required.